

LOWELL DECL. EX. 48

In the U.S. District Court
District of Columbia

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:
Shabtai Scott Shatsky, et :
al :
:
v. :NO. 1:02cv02280
:
The Syrian Arab Republic, :
et al :
:
-----X

February 11, 2013

DEPOSITION OF:

Chani Edri,

a witness, called by counsel pursuant to notice,
commencing at 2:10 p.m., which was taken at Miller
and Chevalier, 655 15th Street, NW, Washington, DC
20005-5701

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<p>1 Appearances</p> <p>2 Robert J. Tolchin, Esq.</p> <p>3 The Berkman Law Office, LLC</p> <p>4 111 Livingston Street, suite 1928</p> <p>5 Brooklyn, NY 11201</p> <p>6 for plaintiffs</p> <p>7</p> <p>8 David I. Schoen, Esq.</p> <p>9 2800 Zelda Road, suite 100-6</p> <p>10 Montgomery, AL 36106</p> <p>11 for plaintiffs</p> <p>12</p> <p>13 Norman Steiner, Esq.</p> <p>14 233 Broadway, suite 900</p> <p>15 New York, NY 10279</p> <p>16 for the plaintiffs</p> <p>17</p> <p>18 Miller and Chevalier</p> <p>19 Richard A. Hibey, Esq.</p> <p>20 Brian Hill, Esq.</p> <p>21 Mark J. Rochon, Esq.</p>	<p>1 INDEX OF EXAMINATIONS</p> <p>2 WITNESS PAGE</p> <p>3</p> <p>4 Chana Edri</p> <p>5</p> <p>6 Direct Examination By Mr. Hill 5</p> <p>7</p> <p>8 Index of Exhibits</p> <p>9 Description Page</p> <p>10 exhibit 1970</p> <p>11 exhibit 20155</p> <p>12 exhibit 21184</p> <p>13 exhibit 22196</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>
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<p>1 Charles F.B. McAleer, Esq.</p> <p>2 655 15th Street NW</p> <p>3 suite 900</p> <p>4 Washington, DC 20005-5701</p> <p>5 for the Palestinian Authority</p> <p>6 and the Palestine Liberation Organization</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>	<p>1 (Whereupon the matter commenced at</p> <p>2 2:10 p.m.)</p> <p>3 Stipulations</p> <p>4 (It is stipulated and agreed by and</p> <p>5 between counsel for the respective parties that</p> <p>6 the reading and signing of this transcript by the</p> <p>7 witness are not waived.</p> <p>8 It is further stipulated and agreed</p> <p>9 that the filing of this transcript with the clerk</p> <p>10 of the court be and the same is hereby waived.)</p> <p>11 * * * * *</p> <p>12</p> <p>13 Whereupon,</p> <p>14 Chana Edri</p> <p>15</p> <p>16 was called for examination by counsel and,</p> <p>17 after having been duly sworn, was examined</p> <p>18 and testified as follows:</p> <p>19 DIRECT EXAMINATION:</p> <p>20 BY MR. HILL:</p> <p>21 Q. Good afternoon, Ms. Edri. Please tell us</p>

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1 your name.

2 **A. Chani Yoffa Edri.**

3 Q. Ms. Edri, have you ever been known by any
4 other names?

5 **A. I used to be Friedman.**

6 Q. Your last name used to be Friedman?

7 **A. Yes.**

8 Q. The way it works is I'll ask questions.

9 You'll give answers. Everything we say will be
10 taken down by Mr. Feuer, our court reporter. He'll
11 turn that into a transcript. You need to answer
12 audibly because he can't take down shakes of the
13 head and that sort of thing.

14 During the course of the day Mr. Steiner may
15 make an objection. If that happens please just wait
16 until he finishes speaking and then unless he
17 instructs you not to answer please go ahead and
18 answer the question.

19 **A. Okay.**

20 Q. During the course of the day I may ask a
21 question and you don't understand it. If that

1 Q. Where is it?

2 **A. In Shomron, Samaria.**

3 Q. Is that in what some people refer to as
4 the West Bank?

5 MR. STEINER: Objection.

6 THE WITNESS: I don't know.

7 BY MR. HILL:

8 Q. Do you know what the West Bank is? Are
9 you familiar with that term?

10 **A. No.**

11 Q. Is the area in which you reside area that
12 was controlled by Israel prior to 1967?

13 MR. STEINER: Objection.

14 THE WITNESS: What?

15 BY MR. HILL:

16 Q. Do you understand there was a war in 1967?

17 **A. Yes.**

18 Q. Do you understand that Israel took some
19 territory that it did not previously control?

20 **A. Yes.**

21 MR. STEINER: Objection.

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1 happens please let me know and I'll rephrase it so
2 you can understand it. Fair enough?

3 **A. Yes.**

4 Q. During the course of the day I may ask a
5 question and you know what the question is and you
6 know what the answer is.

7 I'd ask you to please wait for me to finish
8 speaking before you start speaking because it's very
9 hard for Mr. Feuer to take two of us talking at the
10 same time.

11 **A. Okay.**

12 Q. Is there any reason you won't be able to
13 give full and truthful testimony here today?

14 **A. No.**

15 Q. Are you taking any medication or anything
16 like that that would impair your ability to testify?

17 **A. No.**

18 Q. What's your current address?

19 **A. Derech HaZianut, Kedumim.**

20 Q. In what city or town is that?

21 **A. Kedumim.**

1 BY MR. HILL:

2 Q. Is the area in which you currently live
3 part of the area that was taken by Israel in 1967?

4 MR. STEINER: Objection.

5 THE WITNESS: Yes.

6 BY MR. HILL:

7 Q. Is the area in which you live referred to
8 by some people as a settlement?

9 **A. Yes.**

10 Q. How long have you resided at that address?

11 **A. Three years.**

12 Q. Where did you live prior to that?

13 **A. In Karnei Shomron.**

14 Q. How long did you reside in Karnei Shomron?

15 **A. 23 years.**

16 Q. Have you lived anywhere other than in
17 Karnei Shomron and at the address you provided --

18 **A. No.**

19 Q. Did you live in Tel Aviv for a period of
20 time?

21 **A. No.**

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<p>1 Q. What is your date of birth, ma'am?</p> <p>2 A. February 23, 1987.</p> <p>3 Q. Who are your parents?</p> <p>4 A. Bella Friedman, Reuven Friedman.</p> <p>5 Q. Of what country or countries are you a</p> <p>6 citizen?</p> <p>7 A. Israel and the United States.</p> <p>8 Q. How did you obtain your American</p> <p>9 citizenship?</p> <p>10 A. I don't know.</p> <p>11 MR. STEINER: Objection.</p> <p>12 BY MR. HILL:</p> <p>13 Q. Do you have a Social Security number?</p> <p>14 A. Yes.</p> <p>15 Q. What is it?</p> <p>16 A. I don't know.</p> <p>17 Q. Have you ever paid any taxes to the</p> <p>18 United States government?</p> <p>19 A. No.</p> <p>20 Q. On how many occasions have you been to the</p> <p>21 United States prior to the trip that you are on now?</p>	<p>1 Q. What were you doing here half a year ago?</p> <p>2 A. I came for a visit and I did for my</p> <p>3 daughter national -- to get her citizenship.</p> <p>4 Q. You registered your daughter as an</p> <p>5 American citizen?</p> <p>6 A. Yes.</p> <p>7 Q. Who were you visiting?</p> <p>8 A. My aunt.</p> <p>9 Q. Which aunt?</p> <p>10 A. Her name?</p> <p>11 Q. Yes, please.</p> <p>12 A. Esti.</p> <p>13 Q. Is that your mother's sister?</p> <p>14 A. Yes.</p> <p>15 Q. Prior to that visit when did you last</p> <p>16 travel to the United States?</p> <p>17 A. I think two years ago.</p> <p>18 Q. What did you do on that visit?</p> <p>19 A. I did for my son, I got for him</p> <p>20 citizenship.</p> <p>21 Q. Did you visit family on that trip?</p>
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<p>1 A. I don't understand the question.</p> <p>2 Q. Have you been to the United States before</p> <p>3 coming here today?</p> <p>4 A. Yes.</p> <p>5 Q. How many times have you been to the U.S.</p> <p>6 previously?</p> <p>7 A. What's "previously"?</p> <p>8 Q. How many times have you come to the</p> <p>9 United States during the course of your life before</p> <p>10 coming to this deposition?</p> <p>11 A. I don't know.</p> <p>12 Q. A few, many?</p> <p>13 A. Many.</p> <p>14 Q. Approximately how many?</p> <p>15 A. I don't know.</p> <p>16 Q. Have you ever lived in the United States?</p> <p>17 A. No.</p> <p>18 Q. Prior to coming here for these</p> <p>19 examinations and depositions when was the last time</p> <p>20 you had been to the United States?</p> <p>21 A. Half a year ago.</p>	<p>1 A. Yes.</p> <p>2 Q. Who did you visit on that trip?</p> <p>3 A. My aunt.</p> <p>4 Q. Aunt Esti again?</p> <p>5 A. Yes.</p> <p>6 Q. Prior to those two visits when you were</p> <p>7 getting citizenship for your children and visiting</p> <p>8 your aunt, when was the prior time that you were in</p> <p>9 the United States?</p> <p>10 A. I don't remember.</p> <p>11 Q. You were injured in a bombing that took</p> <p>12 place in February of 2002, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Had you been to the United States before</p> <p>15 that event?</p> <p>16 A. Yes.</p> <p>17 Q. On how many occasions?</p> <p>18 A. I don't know.</p> <p>19 Q. Why did you come to the U.S. before the</p> <p>20 bombing?</p> <p>21 A. Family.</p>

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1 Q. Could you estimate for me the number of
2 times you visited prior to that?

3 **A. I didn't understand the question.**

4 Q. What's your best estimate of how many
5 times you visited the United States before the
6 bombing in 2002?

7 **A. I don't know.**

8 Q. Since the bombing in 2002 you've told me
9 about two trips to the U.S. and you are here for
10 this one obviously.

11 How many other times do you think you have
12 been other than those three times?

13 **A. I don't know.**

14 Q. What's your best estimate of the number of
15 times you've been to the United States since 2002?

16 **A. I don't know.**

17 Q. Why did you obtain American citizenship
18 for your children?

19 **A. Because I wanted -- because I have
20 citizenship.**

21 Q. Do you have any intention to move to the

1 Q. Are you currently working?

2 **A. Yes.**

3 Q. Where do you work?

4 **A. In Ariel University.**

5 Q. Where is Ariel University located?

6 **A. In Ariel.**

7 Q. In Israel?

8 **A. Yes.**

9 Q. How long have you worked there?

10 **A. Five months.**

11 Q. What's your job there?

12 **A. Secretary.**

13 Q. Who is your boss?

14 **A. The name?**

15 Q. Please.

16 **A. Professor Shapiro.**

17 Q. What field does Professor Shapiro teach
18 in?

19 **A. Health, medical.**

20 Q. What is his or her first name?

21 **A. Yair.**

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1 United States?

2 **A. I don't know.**

3 Q. You are not presently planning to move to
4 the U.S., are you?

5 **A. Right now, no. Later on, I don't know.**

6 Q. Are you married?

7 **A. Yes.**

8 Q. What is your husband's name?

9 **A. Moshe.**

10 Q. What citizenship does your husband have?

11 **A. Israeli.**

12 Q. Have you applied for American citizenship
13 for your husband?

14 **A. No.**

15 Q. Why not?

16 MR. STEINER: Objection.

17 THE WITNESS: I don't know.

18 BY MR. HILL:

19 Q. Have you considered applying for U.S.
20 citizenship for your husband?

21 **A. No.**

1 Q. Where did you go to high school, ma'am?

2 **A. Place?**

3 Q. Yes, ma'am.

4 **A. Kedumim.**

5 Q. Did you graduate from high school?

6 **A. Yes.**

7 Q. What year did you graduate?

8 **A. 2005.**

9 Q. Have you been to college?

10 **A. Yes.**

11 Q. Where did you go to college?

12 **A. Ariel.**

13 Q. When did you enroll at Ariel?

14 **A. 2007.**

15 Q. Did you graduate from Ariel?

16 **A. Yes.**

17 Q. What year was that?

18 **A. 2010.**

19 Q. What degree did you earn there?

20 **A. BA.**

21 Q. In what field?

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<p>1 A. Social behavior.</p> <p>2 Q. Have you had any postgraduate course work?</p> <p>3 A. I don't understand the question.</p> <p>4 Q. Have you taken any classes since</p> <p>5 graduating from college?</p> <p>6 A. No.</p> <p>7 Q. Have you had any other studies other than</p> <p>8 college since high school?</p> <p>9 A. Yes.</p> <p>10 Q. Where was that?</p> <p>11 A. Where?</p> <p>12 Q. Where?</p> <p>13 A. In Kiryat Arba.</p> <p>14 Q. What kind of school did you go to in</p> <p>15 Kiryat Arba?</p> <p>16 A. I don't know.</p> <p>17 MR. STEINER: You want to say it in</p> <p>18 Hebrew?</p> <p>19 THE WITNESS: (Hebrew)</p> <p>20 MR. STEINER: Seminary.</p> <p>21 BY MR. HILL:</p>	<p>1 Q. What was the name of the company you</p> <p>2 worked for?</p> <p>3 A. Orcal.</p> <p>4 Q. What's the business at Orcal?</p> <p>5 A. Human resources.</p> <p>6 Q. Does it provide employees for other</p> <p>7 companies, is that what it does?</p> <p>8 A. I don't understand.</p> <p>9 Q. Tell me how Orcal makes money.</p> <p>10 A. It finds people jobs.</p> <p>11 Q. What job did you have at Orcal?</p> <p>12 A. To find people jobs.</p> <p>13 Q. Were you like a career placement counselor</p> <p>14 or something like that?</p> <p>15 A. Yes.</p> <p>16 Q. Since we don't have a translator here, you</p> <p>17 need to answer in English to the best of your</p> <p>18 ability.</p> <p>19 Mr. Steiner for legal reasons should not be</p> <p>20 talking to you in Hebrew. If you don't know the</p> <p>21 word in English, that's fine, just say you don't</p>
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<p>1 Q. You went to a seminary in Kiryat Arba?</p> <p>2 A. Yes.</p> <p>3 Q. How long were you enrolled in the</p> <p>4 seminary?</p> <p>5 A. A year.</p> <p>6 Q. Did that result in a degree or</p> <p>7 certification or anything like that?</p> <p>8 A. No.</p> <p>9 Q. Did you complete your studies there?</p> <p>10 A. Yes.</p> <p>11 Q. Any other schooling since high school that</p> <p>12 you haven't told me about yet?</p> <p>13 A. No.</p> <p>14 Q. Have you had any work since high school</p> <p>15 other than the position you are currently in at</p> <p>16 Ariel University?</p> <p>17 A. Yes.</p> <p>18 Q. Where else have you worked?</p> <p>19 A. Kfar Saba.</p> <p>20 Q. What did do you there?</p> <p>21 A. Human Resources.</p>	<p>1 know.</p> <p>2 A. I don't know the word.</p> <p>3 Q. Describe what your day to day job</p> <p>4 activities were when you worked at Orcal.</p> <p>5 A. To call people that are looking for jobs</p> <p>6 and try to find a suitable job for their</p> <p>7 requirement.</p> <p>8 Q. How long did you work there?</p> <p>9 A. Half a year, maybe more.</p> <p>10 Q. What's your best estimate of how long you</p> <p>11 worked for Orcal?</p> <p>12 A. I gave birth in the middle. I guess it</p> <p>13 adds up to about nine months maybe.</p> <p>14 Q. You worked there for a total of nine</p> <p>15 months but you were on leave for a while after your</p> <p>16 baby was born?</p> <p>17 A. Yes.</p> <p>18 Q. Did you have a job prior to that?</p> <p>19 A. Yes.</p> <p>20 Q. Where was that?</p> <p>21 A. Joseph Kaufman.</p>

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<p>1 Q. What is the business of Joseph Kaufman?</p> <p>2 A. Jackets, they sell jackets.</p> <p>3 Q. What was your job there?</p> <p>4 A. I don't know how you say it.</p> <p>5 Q. That's okay. Was this like a retail store</p> <p>6 where you go in and buy a jacket?</p> <p>7 A. No.</p> <p>8 Q. This was a company that manufactured</p> <p>9 jackets?</p> <p>10 A. They brought in from China.</p> <p>11 Q. They imported jackets?</p> <p>12 A. Yes.</p> <p>13 Q. What was your day to day work at Joseph</p> <p>14 Kaufman like? What did you do?</p> <p>15 A. I made orders for stores and I got orders</p> <p>16 from private people.</p> <p>17 Q. How long did you work there?</p> <p>18 A. Couple of months.</p> <p>19 Q. Did you have a job prior to working at</p> <p>20 Joseph Kaufman?</p> <p>21 A. Yes.</p>	<p>1 job?</p> <p>2 A. Yes.</p> <p>3 Q. What was the name of the friend?</p> <p>4 A. Moshe.</p> <p>5 Q. Do you know Moshe's last name?</p> <p>6 A. Ingal.</p> <p>7 Q. Do you know where he is today?</p> <p>8 A. Ramat HaSharon.</p> <p>9 Q. Does he still work at Initia?</p> <p>10 A. Yes.</p> <p>11 Q. You said this was a friend of your mom's,</p> <p>12 a boyfriend?</p> <p>13 A. Work.</p> <p>14 Q. A co-worker?</p> <p>15 A. Yes.</p> <p>16 Q. Prior to Initia did you have a job?</p> <p>17 A. No.</p> <p>18 Q. Initia was your first job?</p> <p>19 A. Yes.</p> <p>20 Q. Did you serve in the Army?</p> <p>21 A. No.</p>
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<p>1 Q. Where was that?</p> <p>2 A. Initia.</p> <p>3 Q. What's the business of Initia?</p> <p>4 A. Medical products.</p> <p>5 Q. How long did you work there?</p> <p>6 A. It was like also a student job. Maybe</p> <p>7 three years.</p> <p>8 Q. What did do you for indicia?</p> <p>9 A. Secretary.</p> <p>10 Q. Does your mother also work in indicia?</p> <p>11 A. She worked in Direx. It's not the same</p> <p>12 company but it's combined or something like that.</p> <p>13 Q. She worked for a company called Direx</p> <p>14 while you worked at Initia?</p> <p>15 A. I think so.</p> <p>16 Q. Did she help you get the job at Initia?</p> <p>17 A. No.</p> <p>18 Q. Do you think you got that job independent</p> <p>19 of your mom?</p> <p>20 A. Somebody that works with my mom.</p> <p>21 Q. A friend of your mom helped you get the</p>	<p>1 Q. Did you perform national service?</p> <p>2 A. Yes.</p> <p>3 Q. When was that?</p> <p>4 A. 2006.</p> <p>5 Q. Where did you do your service?</p> <p>6 A. Kfar Haroe.</p> <p>7 Q. What's that?</p> <p>8 A. Dormitory school for boys that come from</p> <p>9 not good homes.</p> <p>10 Q. How long did you work there?</p> <p>11 A. Three months.</p> <p>12 Q. Was three months what was required for</p> <p>13 your national service?</p> <p>14 A. No, I went to another place.</p> <p>15 Q. Did you reside in the dormitory while you</p> <p>16 were working there?</p> <p>17 A. What does that mean?</p> <p>18 Q. Did you live there?</p> <p>19 A. Yes.</p> <p>20 Q. In what city was that located?</p> <p>21 A. Kfar Rohi is the name of the place.</p>

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1 Q. Does the dormitory have a name?
 2 A. **Ben Yakir.**
 3 Q. You completed your national service at
 4 another location?
 5 A. **Bat Yam.**
 6 Q. What is Bat Yam?
 7 A. **They care for children that come from**
 8 **homes that -- I don't know.**
 9 Q. These are children that are no longer
 10 living at home?
 11 A. **They are living at home.**
 12 Q. They are living at home but this is like a
 13 daytime facility they go to?
 14 A. **Yes.**
 15 Q. It's not a residential program?
 16 A. **Right. For them, no.**
 17 Q. Did you live in the facility while you
 18 were working there?
 19 A. **I don't understand the question.**
 20 Q. Where did you live while you were working
 21 at Bat Yam?

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1 A. **I lived at home. While working I was in**
 2 **Tel Aviv.**
 3 Q. You commuted from Karnei Shomron to
 4 Tel Aviv to work?
 5 A. **It's not like that.**
 6 Q. Explain to me. How did you get to and
 7 from work?
 8 A. **I lived at home. That period I had an**
 9 **apartment in Tel Aviv. I don't call that my home.**
 10 Q. You did maintain an apartment in Tel Aviv
 11 while you worked at Bat Yam?
 12 A. **Yes.**
 13 Q. You considered yourself living at home
 14 with your mother?
 15 A. **Right.**
 16 Q. Approximately how long did you have that
 17 apartment in Tel Aviv?
 18 A. **Until the end of the year.**
 19 Q. Nine months?
 20 A. **Yes.**
 21 Q. Any other national service?

1 A. **No.**
 2 Q. Did you successfully complete your
 3 national service requirement?
 4 A. **Yes.**
 5 Q. Were you commended in any way for your
 6 work?
 7 A. **Sorry?**
 8 Q. Did you receive any awards, anything like
 9 that?
 10 A. **I don't think so.**
 11 Q. Have you ever received any negative
 12 feedback at work?
 13 A. **No.**
 14 Q. No one has ever told you you've done a
 15 poor job?
 16 A. **No.**
 17 Q. Ever been fired from a job?
 18 A. **Yes.**
 19 Q. Which job?
 20 A. **Joseph.**
 21 Q. Why were you fired from Joseph?

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1 A. **Because they said they didn't have enough**
 2 **money.**
 3 Q. Did the firing have anything to do with
 4 your performance?
 5 A. **I don't understand.**
 6 Q. Did the firing have anything to do with
 7 your job performance?
 8 A. **What does "performance" mean?**
 9 Q. Were you fired because you were doing your
 10 job badly?
 11 A. **No.**
 12 Q. Did anyone ever tell you you were fired
 13 because you were doing your job badly?
 14 A. **No.**
 15 Q. Have you ever been reprimanded at work in
 16 any way?
 17 A. **What is that?**
 18 Q. Have you ever been criticized for the way
 19 you were doing your work?
 20 A. **What?**
 21 Q. Has anyone ever told you you were doing a

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<p>1 bad job at any of your jobs?</p> <p>2 A. No.</p> <p>3 Q. Did you get good grades in college?</p> <p>4 A. Not good.</p> <p>5 Q. What was your grade point average in</p> <p>6 college?</p> <p>7 A. 79.</p> <p>8 Q. Out of 100?</p> <p>9 A. Yes.</p> <p>10 Q. You did graduate, though, right?</p> <p>11 A. Yes.</p> <p>12 Q. Have you ever applied for a job you didn't</p> <p>13 get?</p> <p>14 A. Yes.</p> <p>15 Q. On how many occasions do you think?</p> <p>16 A. I don't know.</p> <p>17 Q. Have you ever not gotten a job you had</p> <p>18 applied for because of poor grades?</p> <p>19 A. No.</p> <p>20 Q. Has anyone ever given you a reason why you</p> <p>21 didn't get hired?</p>	<p>1 are you satisfied with the money you are making?</p> <p>2 A. I guess.</p> <p>3 Q. When did you meet your husband?</p> <p>4 A. Can you say the question different? I</p> <p>5 don't understand.</p> <p>6 Q. I understand you are married, right?</p> <p>7 A. Yes.</p> <p>8 Q. When did you first meet your husband?</p> <p>9 A. A time?</p> <p>10 Q. Yes.</p> <p>11 A. In 2002.</p> <p>12 Q. Had you met him prior to the bombing of</p> <p>13 February 2002?</p> <p>14 A. Yes.</p> <p>15 Q. Was he present when you were injured in</p> <p>16 2002?</p> <p>17 A. Sorry?</p> <p>18 Q. Was he at the scene when you were injured</p> <p>19 in 2002?</p> <p>20 A. No.</p> <p>21 Q. Did he visit you in the hospital?</p>
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<p>1 A. Sorry?</p> <p>2 Q. Has anyone ever told you why you weren't</p> <p>3 hired at a job?</p> <p>4 A. No.</p> <p>5 Q. Are you satisfied with the job you have</p> <p>6 now?</p> <p>7 MR. STEINER: Objection.</p> <p>8 THE WITNESS: What was the question?</p> <p>9 BY MR. HILL:</p> <p>10 Q. Are you satisfied with the job you have</p> <p>11 now?</p> <p>12 MR. STEINER: Objection.</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. HILL:</p> <p>15 Q. Do you like your boss?</p> <p>16 A. Yes.</p> <p>17 Q. Are you content with your pay?</p> <p>18 A. I don't understand that.</p> <p>19 Q. Are you satisfied with the pay?</p> <p>20 A. What is "pay"?</p> <p>21 Q. The money you are being paid at your job,</p>	<p>1 A. Yes.</p> <p>2 Q. Were you and he dating at that time?</p> <p>3 A. What's dating?</p> <p>4 Q. Did you consider him to be a boyfriend at</p> <p>5 that time?</p> <p>6 A. No.</p> <p>7 Q. Did you have another boyfriend at the</p> <p>8 time?</p> <p>9 A. No.</p> <p>10 Q. He was just a friend at the time?</p> <p>11 A. Yes.</p> <p>12 Q. When would you first say that you and your</p> <p>13 husband started dating?</p> <p>14 A. I don't know.</p> <p>15 Q. Was it while you were still in high</p> <p>16 school?</p> <p>17 A. I don't know.</p> <p>18 Q. When were you engaged?</p> <p>19 A. 2007.</p> <p>20 Q. How long had you dated before you became</p> <p>21 engaged?</p>

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1 **A. I don't know. At the time it wasn't**
 2 **called dating so I don't know.**

3 Q. Were you in regular contact with your
 4 husband between 2002 and your engagement in 2007?

5 **A. Yes.**

6 Q. He lived in the same town that you lived
 7 in?

8 **A. No.**

9 Q. But you were in contact with him over the
 10 phone or e-mail or that sort of thing, right?

11 **A. Yes.**

12 Q. Did you have any boyfriends before your
 13 husband?

14 **A. No.**

15 Q. When were you married?

16 **A. January 10, 2008.**

17 Q. Do you have a happy marriage?

18 MR. STEINER: Objection.

19 THE WITNESS: Depends who looks at
 20 it, how you look at it.

21 BY MR. HILL:

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1 Q. In your opinion is it a happy marriage?

2 **A. It could be better.**

3 Q. Are you considering divorce?

4 **A. No.**

5 Q. In what way could your marriage be better?

6 MR. STEINER: Objection.

7 THE WITNESS: I don't know.

8 BY MR. HILL:

9 Q. Have you and your husband ever considered
 10 getting divorced?

11 **A. No.**

12 Q. You have two children, right?

13 **A. Yes.**

14 Q. Are you happy with your children?

15 **A. Very.**

16 Q. Have you and your husband ever had any
 17 sort of marital counseling or anything like that?

18 **A. No.**

19 Q. Any difficulties in your marriage that you
 20 thought required help from outside the two of you?

21 **A. No.**

1 Q. Any infidelity?

2 **A. What's that?**

3 Q. Has either of you cheated on the other?

4 **A. No.**

5 Q. Do you speak any languages other than
 6 English?

7 **A. Yes.**

8 Q. What other languages do you speak?

9 **A. Hebrew.**

10 Q. How long have you spoken Hebrew?

11 **A. My whole life.**

12 Q. How long have you spoken English?

13 **A. 26 years.**

14 Q. There have been a couple of occasions
 15 where you have told me you didn't understand my
 16 question.

17 Is that because you are having difficulty
 18 understanding English?

19 **A. Your high words.**

20 Q. Some of the words I'm asking, you don't
 21 know what they mean?

1 **A. Right.**

2 Q. As I said at the beginning, if that
 3 happens again please let me know because otherwise
 4 everybody will assume that you do understand. If
 5 you don't, please let me know.

6 **A. Okay.**

7 Q. What are the names of your children?

8 **A. Noam and Oria.**

9 Q. How old are they?

10 **A. Noam is three years and eight months and**
 11 **Oria is a year and two months.**

12 Q. Are you planning to have more children?

13 **A. Yes.**

14 Q. Do you know where your father is currently
 15 living?

16 **A. Yes.**

17 Q. What is his address?

18 **A. Karnei Shomron.**

19 Q. Do you know the street address?

20 **A. HaGefen.**

21 Q. Why did your parents get divorced?

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<p>1 A. I don't know.</p> <p>2 Q. Has either of them ever told you?</p> <p>3 A. No.</p> <p>4 Q. Were you in favor of them divorcing?</p> <p>5 A. I don't understand.</p> <p>6 Q. Did you support them getting divorced?</p> <p>7 A. No.</p> <p>8 Q. Did you do anything to express your</p> <p>9 opposition to them getting divorced?</p> <p>10 A. Sorry?</p> <p>11 Q. Did you ever tell your parents you did not</p> <p>12 want them to get divorced?</p> <p>13 A. I don't remember.</p> <p>14 Q. When did your parents separate?</p> <p>15 A. When I was in fourth grade, when I was</p> <p>16 ten.</p> <p>17 Q. That would have been approximately 1997,</p> <p>18 is that right?</p> <p>19 A. I don't know.</p> <p>20 Q. It was before the bombing in 2002?</p> <p>21 A. Yes.</p>	<p>1 MR. STEINER: Can I have the last</p> <p>2 question read back?</p> <p>3 (Whereupon the requested portion of</p> <p>4 the record was read by the reporter)</p> <p>5 BY MR. HILL:</p> <p>6 Q. Before the break we were talking about</p> <p>7 your relationship with your father.</p> <p>8 You mentioned that you and he did not have a</p> <p>9 good relationship. The question I wanted to know</p> <p>10 was why do you and your father have a bad</p> <p>11 relationship?</p> <p>12 A. Because I don't like him.</p> <p>13 Q. Why don't you like him?</p> <p>14 A. I just don't like him.</p> <p>15 Q. Did he do anything to you to cause you to</p> <p>16 not like him?</p> <p>17 A. I just don't like him.</p> <p>18 Q. You have no reason for the dislike of your</p> <p>19 father?</p> <p>20 A. No.</p> <p>21 MR. STEINER: Objection.</p>
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<p>1 Q. When were your parents divorced?</p> <p>2 A. I don't know.</p> <p>3 Q. Do you believe the bombing had anything to</p> <p>4 do with your parents' divorce?</p> <p>5 A. No.</p> <p>6 Q. Do you have a good relationship with your</p> <p>7 mother?</p> <p>8 A. Yes, I guess.</p> <p>9 Q. What do you mean?</p> <p>10 A. Yes.</p> <p>11 Q. Do you have a good relationship with your</p> <p>12 father?</p> <p>13 A. No.</p> <p>14 Q. Why not?</p> <p>15 A. I don't know.</p> <p>16 Q. I need you to tell me the reasons, ma'am.</p> <p>17 A. I would appreciate if you would --</p> <p>18 MR. HILL: Do you want to take a</p> <p>19 break?</p> <p>20 THE WITNESS: Yes.</p> <p>21 (A short recess was taken)</p>	<p>1 BY MR. HILL:</p> <p>2 Q. Did you like him before he moved out?</p> <p>3 A. I don't know.</p> <p>4 Q. How long have you not liked your father?</p> <p>5 A. I don't know.</p> <p>6 Q. Can you ever remember liking your father?</p> <p>7 A. I don't know.</p> <p>8 Q. Before your father moved out did you and</p> <p>9 he have problems?</p> <p>10 MR. STEINER: Objection.</p> <p>11 THE WITNESS: I don't know.</p> <p>12 BY MR. HILL:</p> <p>13 Q. What do you mean you don't know?</p> <p>14 MR. STEINER: Objection.</p> <p>15 THE WITNESS: I don't remember.</p> <p>16 BY MR. HILL:</p> <p>17 Q. You cannot remember ever having</p> <p>18 disagreements with your father when he lived in the</p> <p>19 same house with you?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: What?</p>

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<p>1 BY MR. HILL:</p> <p>2 Q. You were in fourth grade when your dad</p> <p>3 moved out?</p> <p>4 A. Yes.</p> <p>5 Q. Can you remember having arguments with</p> <p>6 your dad before he moved out?</p> <p>7 A. I don't know.</p> <p>8 Q. The question was do you remember having</p> <p>9 arguments with your father? Are you saying you did</p> <p>10 not?</p> <p>11 A. I don't remember.</p> <p>12 Q. Sitting here today you cannot tell me if</p> <p>13 you ever had an argument with your father before he</p> <p>14 moved out when you were in the fourth grade?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MR. HILL:</p> <p>18 Q. Can you remember having an argument with</p> <p>19 him after he moved out?</p> <p>20 A. I don't remember.</p> <p>21 Q. Can you ever remember having an argument</p>	<p>1 A. I don't know.</p> <p>2 Q. When was the last time?</p> <p>3 A. Couple of months ago.</p> <p>4 Q. When was the last time before that?</p> <p>5 A. I don't know.</p> <p>6 Q. Has your father ever visited you in your</p> <p>7 home?</p> <p>8 A. No.</p> <p>9 Q. He's never come to the place where you</p> <p>10 live?</p> <p>11 A. No.</p> <p>12 Q. How do you communicate with him?</p> <p>13 A. When I meet him on the street.</p> <p>14 Q. Do you live in the same town now?</p> <p>15 A. No.</p> <p>16 Q. When did you last live in the same town</p> <p>17 with him?</p> <p>18 A. Three years ago.</p> <p>19 Q. In the last three years have you</p> <p>20 communicated with him?</p> <p>21 A. What's "communicated"?</p>
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<p>1 with your father?</p> <p>2 A. No.</p> <p>3 Q. Sitting here today you can never remember</p> <p>4 having a disagreement with your father?</p> <p>5 A. I don't know what "disagreement" means.</p> <p>6 Q. Can you remember having a disagreement</p> <p>7 with your father?</p> <p>8 A. I don't know.</p> <p>9 Q. Do you understand that you've taken an</p> <p>10 oath to tell the truth?</p> <p>11 MR. STEINER: Objection.</p> <p>12 BY MR. HILL:</p> <p>13 Q. Are you, in fact, telling me the truth?</p> <p>14 A. Yes.</p> <p>15 Q. When was the last time you spoke to your</p> <p>16 father?</p> <p>17 A. I speak to him a lot. Not long ago.</p> <p>18 Q. You speak to him a lot even though you</p> <p>19 don't like him, is that right?</p> <p>20 A. Yes.</p> <p>21 Q. How frequently do you speak to him?</p>	<p>1 Q. Spoken with him?</p> <p>2 A. Yes.</p> <p>3 Q. How did you speak to him?</p> <p>4 A. I saw him.</p> <p>5 Q. Where?</p> <p>6 A. In a wedding.</p> <p>7 Q. Whose wedding?</p> <p>8 A. My brother's.</p> <p>9 Q. Apart from seeing him at your brother's</p> <p>10 wedding have you seen him in the last three years?</p> <p>11 A. Yes.</p> <p>12 Q. What was the occasion?</p> <p>13 A. In the neighborhood where my parents live.</p> <p>14 Q. Have you seen him in the last three years?</p> <p>15 A. Yes, in the neighborhood where my parents</p> <p>16 live.</p> <p>17 Q. You've seen him twice in the neighborhood</p> <p>18 in --</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: I don't know how many</p> <p>21 times. I see him a lot. I don't know.</p>

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<p>1 BY MR. HILL:</p> <p>2 Q. You just see him in the neighborhood?</p> <p>3 A. Yes.</p> <p>4 Q. Does he ever come to visit you when you</p> <p>5 are in Karnei Shomron?</p> <p>6 A. No.</p> <p>7 Q. Do you ever visit with him?</p> <p>8 A. No.</p> <p>9 Q. Do you communicate with him other than</p> <p>10 face to face?</p> <p>11 A. No.</p> <p>12 Q. You don't e-mail him?</p> <p>13 A. No.</p> <p>14 Q. Don't speak on the phone?</p> <p>15 A. No.</p> <p>16 Q. Don't text him?</p> <p>17 A. No.</p> <p>18 Q. Are you Face Book friends?</p> <p>19 A. No.</p> <p>20 Q. Your testimony is that you don't know why</p> <p>21 you don't like your own father, is that right?</p>	<p>1 Q. You know you talked with your therapist</p> <p>2 about your father but you don't know what you told</p> <p>3 her?</p> <p>4 MR. STEINER: Objection.</p> <p>5 Just because he says the question that</p> <p>6 way doesn't mean you are doing anything wrong.</p> <p>7 THE WITNESS: I think I didn't</p> <p>8 understand the whole following.</p> <p>9 What does it mean that I spoke to my</p> <p>10 therapist about my father? You said something far</p> <p>11 back.</p> <p>12 BY MR. HILL:</p> <p>13 Q. Let me rephrase the question.</p> <p>14 You told me that you spoke to Miriam Shapiro</p> <p>15 about your relationship with your father, right?</p> <p>16 A. Yes.</p> <p>17 Q. What did you tell her about that</p> <p>18 relationship?</p> <p>19 A. I don't think I spoke about my</p> <p>20 relationship with my father. About the whole issue.</p> <p>21 Q. Which issue?</p>
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<p>1 MR. STEINER: Objection. That wasn't</p> <p>2 her testimony.</p> <p>3 MR. HILL: Then correct me.</p> <p>4 BY MR. HILL:</p> <p>5 Q. Do you know why you don't like your own</p> <p>6 father, ma'am?</p> <p>7 A. I don't like him.</p> <p>8 Q. Why don't you like him?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: Because I don't like</p> <p>11 him.</p> <p>12 BY MR. HILL:</p> <p>13 Q. Have you ever talked with any psychologist</p> <p>14 or psychiatrist about your relationship with your</p> <p>15 father?</p> <p>16 A. Yes.</p> <p>17 Q. Which ones?</p> <p>18 A. Miriam Shapiro.</p> <p>19 Q. What did you tell Miriam Shapiro about</p> <p>20 your relationship with your father?</p> <p>21 A. I don't know.</p>	<p>1 A. Of my parents.</p> <p>2 Q. What's the issue?</p> <p>3 A. That they don't live together.</p> <p>4 Q. You spoke to Ms. Shapiro about that?</p> <p>5 A. Yes.</p> <p>6 Q. Did you talk to her about your father?</p> <p>7 A. Yes.</p> <p>8 Q. What did you say?</p> <p>9 A. Should I invite him to my wedding.</p> <p>10 Q. You talked with her about whether he</p> <p>11 should come to your wedding?</p> <p>12 A. Yes.</p> <p>13 Q. What did she say?</p> <p>14 A. That I should think about it.</p> <p>15 Q. Why were you reluctant to invite your</p> <p>16 father to your wedding?</p> <p>17 A. Because I don't like him.</p> <p>18 Q. Did your father abuse you, ma'am?</p> <p>19 A. What?</p> <p>20 Q. Did your father abuse you?</p> <p>21 A. What's "abuse"?</p>

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<p>1 Q. Did he strike you physically?</p> <p>2 A. Strike?</p> <p>3 Q. Did he hit you?</p> <p>4 A. No.</p> <p>5 Q. Your father never struck you?</p> <p>6 A. No.</p> <p>7 Q. Was he mean to you?</p> <p>8 A. I don't know. What does "mean" mean?</p> <p>9 Q. You don't know what the word "mean" means?</p> <p>10 A. It's general.</p> <p>11 Q. You are unable to say whether your father</p> <p>12 was mean to you?</p> <p>13 MR. STEINER: Objection.</p> <p>14 BY MR. HILL:</p> <p>15 Q. Is that your testimony?</p> <p>16 MR. STEINER: No, it's not. That's</p> <p>17 my objection.</p> <p>18 BY MR. HILL:</p> <p>19 Q. Are you unable to say whether or not your</p> <p>20 father was mean to you?</p> <p>21 MR. STEINER: She answered.</p>	<p>1 Q. What did he say to you that was not nice?</p> <p>2 A. I can't remember.</p> <p>3 Q. Can you remember any not nice thing your</p> <p>4 father ever said to you?</p> <p>5 A. I can't remember.</p> <p>6 Q. You can remember him saying not nice</p> <p>7 things, you just can't remember what?</p> <p>8 A. Yes.</p> <p>9 Q. How frequently did he say not nice things</p> <p>10 to you?</p> <p>11 A. I don't know.</p> <p>12 Q. Was it on more than one occasion?</p> <p>13 A. I don't know.</p> <p>14 Q. It might have been just one time he said</p> <p>15 something not nice to you?</p> <p>16 A. I don't know.</p> <p>17 Q. Was it more than --</p> <p>18 MR. STEINER: Objection. She is</p> <p>19 telling you. She doesn't know.</p> <p>20 BY MR. HILL:</p> <p>21 Q. Did he ever make you sad?</p>
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<p>1 Objection.</p> <p>2 THE WITNESS: What's the question?</p> <p>3 BY MR. HILL:</p> <p>4 Q. Are you unable to say whether your father</p> <p>5 was mean to you?</p> <p>6 MR. STEINER: Objection.</p> <p>7 THE WITNESS: General.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Do you know what the word "mean" means,</p> <p>10 ma'am?</p> <p>11 MR. STEINER: It is pretty general.</p> <p>12 BY MR. HILL:</p> <p>13 Q. What does it mean to you?</p> <p>14 A. "Mean"?</p> <p>15 Q. Yes, ma'am.</p> <p>16 A. It could be that he made me mad, it could</p> <p>17 be that he made me sad.</p> <p>18 Q. Did your father ever make you mad?</p> <p>19 A. Yes.</p> <p>20 Q. What did he do that made you mad?</p> <p>21 A. He said not nice things to me.</p>	<p>1 A. Yes.</p> <p>2 Q. What did he do that made you sad?</p> <p>3 A. He told me not nice things.</p> <p>4 Q. What not nice things did he tell you,</p> <p>5 ma'am?</p> <p>6 A. I don't remember.</p> <p>7 Q. You can remember your father telling you</p> <p>8 not nice things, right?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: I remember my father</p> <p>11 making me sad.</p> <p>12 BY MR. HILL:</p> <p>13 Q. He made you sad because he told you not</p> <p>14 nice things?</p> <p>15 A. Yes.</p> <p>16 Q. But you can't remember any of the not nice</p> <p>17 things he said?</p> <p>18 MR. STEINER: Objection.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Did he make you sad more than once?</p> <p>21 A. I don't know.</p>

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1 Q. Can you remember more than one occasion
2 when your father made you sad?

3 **A. I don't know.**

4 Q. You can either remember or you can't.

5 MR. STEINER: Objection.

6 BY MR. HILL:

7 Q. Can you remember --

8 MR. STEINER: I've given you a lot of
9 scope. You are getting close to intimidating the
10 witness.

11 MR. HILL: The witness is being
12 evasive.

13 MR. STEINER: She is answering.

14 MR. HILL: I'm entitled to examine
15 her.

16 I have not broken any rules. If you
17 have an objection, make your objection and I'll keep
18 asking questions.

19 MR. STEINER: You are coming close to
20 harassing and intimidating.

21 MR. HILL: Would you like to adjourn

1 that.

2 MR. STEINER: The record will speak
3 for itself.

4 BY MR. HILL:

5 Q. Can you talk to Miriam Shapiro about any
6 other aspect of your relationship with your father?

7 **A. Not that I could think of.**

8 Q. Did you invite your father to your
9 wedding?

10 **A. Yes.**

11 Q. Did he come?

12 **A. No.**

13 Q. Why not?

14 **A. I don't know.**

15 Q. Did he communicate with you about why he
16 didn't come?

17 **A. Yes.**

18 Q. What did he tell you?

19 **A. He wrote something, circumstances, he
20 can't come.**

21 Q. He wrote something to you?

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1 and call the court for a protective order?

2 MR. STEINER: I don't need you to
3 suggest possible remedies to me, although I
4 appreciate your assistance.

5 Your assistance is not needed in how I
6 represent my client. If I feel the need to call a
7 magistrate I'll let that be known immediately but in
8 my opinion you are getting close to harassing and
9 intimidating here.

10 It's a sensitive subject. By asking
11 the question repeatedly five or six times as you are
12 doing, it does get close to intimidating and
13 harassing her.

14 MR. HILL: I'm entitled to
15 cross-examine the witness particularly when the
16 witness appears to be being untruthful.

17 MR. STEINER: You are certainly
18 allowed to cross-examine the witness but what you
19 can't do is just keep asking the same question five
20 or six times until you get an answer that you like.

21 MR. HILL: I don't think I'm doing

1 **A. Yes.**

2 Q. How did he write to you?

3 **A. By e-mail.**

4 Q. He sent you an e-mail saying
5 circumstances prevented him from coming to your
6 wedding?

7 **A. Something like that.**

8 Q. Did he say what circumstances prevented
9 him from coming to his daughter's wedding?

10 **A. I don't know.**

11 Q. Did you believe him?

12 **A. I don't know. I don't care.**

13 Q. Did you ever tell anyone whether or not
14 you believed the e-mail from your father claiming
15 that circumstances prevented him from attending your
16 wedding?

17 **A. No.**

18 Q. Did he attend the wedding of any of your
19 other siblings?

20 **A. Yes.**

21 Q. How many of your other siblings were

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<p>1 married?</p> <p>2 A. Two.</p> <p>3 Q. Which ones?</p> <p>4 A. Yehiel and Ilan.</p> <p>5 Q. He attended both of those weddings?</p> <p>6 A. Yes.</p> <p>7 Q. Did he play a role in either of those</p> <p>8 weddings?</p> <p>9 A. Play a role?</p> <p>10 Q. Did he do something? Did he --</p> <p>11 MR. STEINER: Objection. She will</p> <p>12 tell you if you ask a proper question.</p> <p>13 THE WITNESS: I don't understand.</p> <p>14 I'm sorry.</p> <p>15 BY MR. HILL:</p> <p>16 Q. How many years of education have you had</p> <p>17 in English?</p> <p>18 MR. STEINER: Objection.</p> <p>19 THE WITNESS: What does it mean</p> <p>20 "education"?</p> <p>21 BY MR. HILL:</p>	<p>1 father other than what you've told me so far?</p> <p>2 A. No.</p> <p>3 Q. When you saw him at your siblings' wedding</p> <p>4 did you talk to him about why he did not come to</p> <p>5 your wedding?</p> <p>6 MR. STEINER: Objection.</p> <p>7 THE WITNESS: No.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Did you speak to him at all?</p> <p>10 A. Yes.</p> <p>11 Q. What did you say?</p> <p>12 A. I asked him if he wants to take a picture</p> <p>13 with my son.</p> <p>14 Q. Did you say anything else?</p> <p>15 A. Not that I can remember.</p> <p>16 Q. Did he say anything to you?</p> <p>17 A. I don't know.</p> <p>18 Q. Apart from talking with Miriam Shapiro</p> <p>19 have you spoken with any other mental health</p> <p>20 professional about your relationship with your</p> <p>21 father?</p>
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<p>1 Q. Do you know what the word "education"</p> <p>2 means?</p> <p>3 A. Yes. What does it mean?</p> <p>4 Q. How many years did you study English?</p> <p>5 MR. STEINER: Objection.</p> <p>6 THE WITNESS: I guess first to 12.</p> <p>7 BY MR. HILL:</p> <p>8 Q. Do you believe you are proficient in the</p> <p>9 language of English?</p> <p>10 A. I'm sorry?</p> <p>11 Q. Do you believe you are proficient in</p> <p>12 the --</p> <p>13 A. What's "proficient" mean?</p> <p>14 Q. Do you know what "proficient" means?</p> <p>15 A. No.</p> <p>16 Q. Can you speak English?</p> <p>17 A. Yes, but I guess not in such a high level.</p> <p>18 Q. Do you believe the words I'm asking you</p> <p>19 are high level English?</p> <p>20 A. Yes.</p> <p>21 Q. Any other reason you don't like your</p>	<p>1 A. I think there were psychologists when we</p> <p>2 were younger but I don't remember.</p> <p>3 Q. How old were you when you saw these</p> <p>4 psychologists that you are referring to?</p> <p>5 A. I don't know.</p> <p>6 Q. Is this before the bombing or after?</p> <p>7 A. Before.</p> <p>8 Q. Did you see this psychologist by yourself</p> <p>9 or with someone else?</p> <p>10 A. I don't remember.</p> <p>11 Q. Where did you go to see the psychologist?</p> <p>12 A. I don't know.</p> <p>13 Q. Why did you go to see the psychologist?</p> <p>14 A. I guess my mother told me.</p> <p>15 Q. Okay.</p> <p>16 A. I don't know if I -- I was told to.</p> <p>17 Q. How old were you when you were told to go</p> <p>18 to the psychologist by your mother?</p> <p>19 A. I don't know.</p> <p>20 Q. Was this before your father moved out or</p> <p>21 after?</p>

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1 **A. I think after.**

2 Q. How many times did you go see the
3 psychologist after your father moved out?

4 **A. I don't remember.**

5 Q. Was this at school?

6 **A. No.**

7 Q. Was it at a hospital?

8 **A. No.**

9 MR. STEINER: We're going to take a
10 little break.

11 (Whereupon, a recess was taken from
12 3:04 p.m. to 3:09 p.m.)

13 BY MR. HILL:

14 Q. I'd like to go over your history of
15 psychological and mental health treatment.

16 Before we broke we were discussing some
17 sessions you had had as a child. Do you remember
18 that?

19 **A. Yes.**

20 Q. These are the sessions that your mother
21 told you to go to?

1 **another one. I don't remember what went on, so I
2 don't know.**

3 Q. You saw at least one man in this
4 timeframe, is that right?

5 **A. Yes.**

6 Q. This was when you were in elementary
7 school, is that right?

8 **A. I don't remember.**

9 Q. What did you talk about with this man?

10 **A. I don't remember.**

11 Q. Did you talk about your parents?

12 **A. Yes.**

13 Q. Did you talk about subjects other than
14 your parents?

15 **A. I don't remember.**

16 Q. Did you talk about school?

17 **A. I don't know.**

18 Q. Did you talk about relationships with your
19 siblings?

20 **A. I don't know.**

21 Q. Did you talk about friends?

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1 **A. I don't know if it was my mother. I don't
2 remember who it was.**

3 Q. Somebody told you to go?

4 **A. Yes.**

5 Q. Approximately what grade were you in when
6 you were told to go to the psychiatrist the first
7 time?

8 **A. I don't remember.**

9 Q. How long did you see that psychiatrist?

10 **A. I don't know if it was a psychiatrist. I
11 didn't say it was a psychiatrist.**

12 Q. What kind of a person did you go to to
13 talk to?

14 **A. Somebody from that field.**

15 Q. Somebody from the mental health field?

16 **A. Yes.**

17 Q. How many times did you meet with that
18 person?

19 **A. I don't remember.**

20 Q. Was this a man or a woman?

21 **A. I think it was a man. Maybe it was**

1 **A. I don't know.**

2 Q. Was this in connection with your parents
3 breaking up?

4 **A. Yes.**

5 Q. What do you remember talking with this
6 psychologist or professional about your parents'
7 breakup?

8 **A. I don't remember anything.**

9 Q. Did it help you?

10 **A. I don't know.**

11 Q. Do you believe you saw this person more
12 than once?

13 **A. I don't know.**

14 Q. Do you believe you saw more than one
15 person in this timeframe?

16 **A. I think so.**

17 Q. Was the second person you saw also a man?

18 **A. No, a woman.**

19 Q. You saw a man and a woman?

20 **A. Yes.**

21 Q. How many appointments do you think you had

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<p>1 with the man?</p> <p>2 A. I don't know.</p> <p>3 Q. How many appointments do you think you had</p> <p>4 with the woman?</p> <p>5 A. I don't remember.</p> <p>6 Q. Did you talk with her about something</p> <p>7 other than parents?</p> <p>8 A. I don't think so.</p> <p>9 Q. Do you remember talking to her about your</p> <p>10 parents breaking up?</p> <p>11 A. I'm sorry, I don't remember anything from</p> <p>12 that time period.</p> <p>13 Q. Do you know where you went for these</p> <p>14 sessions?</p> <p>15 A. No.</p> <p>16 Q. Did the person come to your home?</p> <p>17 A. I don't remember.</p> <p>18 Q. Did you go to an office somewhere?</p> <p>19 A. Yes. We're talking about the man?</p> <p>20 Q. Yes.</p> <p>21 A. I don't think the man came to my home.</p>	<p>1 treatment?</p> <p>2 A. Age 10 and 12?</p> <p>3 Q. Yes.</p> <p>4 Apart from those sessions you described</p> <p>5 where you talked about your parents when you were</p> <p>6 approximately between the ages of 10 and 12, when</p> <p>7 was the next time you had any mental health</p> <p>8 treatment of any kind?</p> <p>9 A. How old was I? Maybe after 2002.</p> <p>10 Q. Some time after the bombing?</p> <p>11 A. Yes.</p> <p>12 Q. When is the first time after the bombing</p> <p>13 that you had some sort of mental health treatment?</p> <p>14 A. I don't remember.</p> <p>15 Q. Was it while you were in the hospital?</p> <p>16 A. I don't think I had treatment. Maybe</p> <p>17 somebody came and tried to talk to me but I didn't</p> <p>18 talk to them.</p> <p>19 Q. You think somebody came to talk to you in</p> <p>20 the hospital and you didn't want to talk to them?</p> <p>21 A. I don't remember talking to them. I</p>
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<p>1 Q. Do you know where his office was?</p> <p>2 A. No.</p> <p>3 Q. Was it in Karnei Shomron?</p> <p>4 A. I don't know.</p> <p>5 Q. How about the woman, was that in your home</p> <p>6 or in her office?</p> <p>7 A. I don't remember.</p> <p>8 Q. How many times do you think you met him?</p> <p>9 A. I don't remember. I just know there's</p> <p>10 this woman.</p> <p>11 I don't remember anything, where it was</p> <p>12 or -- I don't remember.</p> <p>13 Q. What's your best estimate of how old are</p> <p>14 you were when you had these sessions that you</p> <p>15 described?</p> <p>16 A. I guess from age 10 to maybe 13, maybe 12.</p> <p>17 I don't know.</p> <p>18 Q. Apart from those sessions with the man and</p> <p>19 the woman where you talked about your parents when</p> <p>20 you were probably between 10 and 12, when was the</p> <p>21 next time you had any sort of mental health</p>	<p>1 remember that a lady came and said she is something</p> <p>2 but I didn't want to talk.</p> <p>3 Q. Why didn't you want to talk?</p> <p>4 A. I was too -- with everything I wasn't</p> <p>5 ready to talk.</p> <p>6 Q. After you left the hospital did you have</p> <p>7 any mental health treatment?</p> <p>8 A. Yes.</p> <p>9 Q. When did that start?</p> <p>10 A. I don't remember.</p> <p>11 Q. Do you remember who you saw?</p> <p>12 A. Valerie something. I don't remember the</p> <p>13 name, sorry.</p> <p>14 Q. Valerie Velkes?</p> <p>15 A. Yes.</p> <p>16 Q. How many occasions did you meet with</p> <p>17 Valerie Velkes?</p> <p>18 A. I don't remember, but more than ...</p> <p>19 Q. Over how long of a period did you meet</p> <p>20 with Valerie Velkes?</p> <p>21 A. I'm sorry?</p>

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<p>1 Q. Over how long a period did you meet with</p> <p>2 Dr. Velkes?</p> <p>3 A. What do you mean?</p> <p>4 Q. Did you meet with her over three months,</p> <p>5 two years?</p> <p>6 A. I don't know.</p> <p>7 MR. HILL: Let's mark this as exhibit</p> <p>8 19.</p> <p>9 (Whereupon the proffered item was</p> <p>10 marked as exhibit 19.)</p> <p>11 BY MR. HILL:</p> <p>12 Q. Ma'am, I'm showing you what we've marked</p> <p>13 as exhibit 19. Take a look, if you would, at that</p> <p>14 packet.</p> <p>15 It appears to be three different letters</p> <p>16 from Valerie Velkes. Tell me if that is, in fact,</p> <p>17 what it is.</p> <p>18 A. Yes.</p> <p>19 Q. Have you seen these letters before?</p> <p>20 A. Yes.</p> <p>21 Q. When did you first see them?</p>	<p>1 strongly recommend that she be --</p> <p>2 A. Where are you?</p> <p>3 Q. However, under the present circumstances,</p> <p>4 I strongly recommend that she be given the available</p> <p>5 bagrut tests intended for children with learning</p> <p>6 disabilities.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. What are bagrut tests intended for</p> <p>10 children with learning disabilities?</p> <p>11 A. It's to do the testing in an easier way.</p> <p>12 There are all different kinds of ways and I guess</p> <p>13 that's why -- I didn't read it. I saw it. That's</p> <p>14 why I guess she gave it.</p> <p>15 Q. What is a bagrut test?</p> <p>16 A. It's exams at the end of -- to get into</p> <p>17 college for every subject.</p> <p>18 Q. Did you take a bagrut test?</p> <p>19 A. Yes.</p> <p>20 Q. Which one did you take?</p> <p>21 A. All of them.</p>
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<p>1 A. I did see all of them I think, right?</p> <p>2 Yes, I did. When did I first see them? I don't</p> <p>3 know.</p> <p>4 Q. Did you first see them shortly after they</p> <p>5 were dated?</p> <p>6 A. The first one I don't know when I saw.</p> <p>7 The second one I saw I guess -- I don't</p> <p>8 remember. I don't know when I saw them. I don't</p> <p>9 know.</p> <p>10 Q. You have seen all three of these before</p> <p>11 today?</p> <p>12 A. Yes.</p> <p>13 Q. If you look at the first letter in this</p> <p>14 package you'll see it's dated March 24, 2003. Do</p> <p>15 you see that?</p> <p>16 A. Yes.</p> <p>17 Q. This is addressed to whom it may concern.</p> <p>18 Do you know why Dr. Velkes wrote this letter?</p> <p>19 A. No.</p> <p>20 Q. In the last sentence Dr. Velkes</p> <p>21 wrote: However, under the present circumstances I</p>	<p>1 Q. What is that?</p> <p>2 A. For every subject you take the test.</p> <p>3 Q. Did you take a bagrut test intended for</p> <p>4 children with learning disabilities?</p> <p>5 A. Yes.</p> <p>6 Q. Did you take the tests for non-learning</p> <p>7 disabled students?</p> <p>8 A. I don't understand the question.</p> <p>9 Q. As I understand it, what you are saying is</p> <p>10 there's bagrut tests in each subject like math or</p> <p>11 science and so forth, right?</p> <p>12 A. Yes.</p> <p>13 Q. You took one of those tests in each</p> <p>14 subject, right?</p> <p>15 A. Yes.</p> <p>16 Q. Is there a regular test and a test for</p> <p>17 people with learning disabilities?</p> <p>18 A. There's also like that.</p> <p>19 I told you it has all kinds of different</p> <p>20 ways of making it easier. I don't know how she</p> <p>21 wrote it here but -- or that there's a different</p>

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<p>1 tests.</p> <p>2 There are all kinds of different options or</p> <p>3 you get more time.</p> <p>4 Q. Did you exercise any of the options when</p> <p>5 you took the bagrut tests?</p> <p>6 A. Yes.</p> <p>7 Q. Which ones did you exercise?</p> <p>8 A. A different test, and I got also more</p> <p>9 time.</p> <p>10 Q. You say you took a different test. What</p> <p>11 kind of test did you take?</p> <p>12 A. I don't know how to say it in English.</p> <p>13 Q. Do you believe you did what she</p> <p>14 recommended here which is take the test intended for</p> <p>15 children with learning disabilities?</p> <p>16 A. Yes.</p> <p>17 Q. Did you pass that test?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall what your scores were?</p> <p>20 A. No.</p> <p>21 Q. Were your scores good enough to go to</p>	<p>1 A. Yes.</p> <p>2 Q. But you retook it even though you passed?</p> <p>3 A. Yes.</p> <p>4 Q. Did you improve the second time?</p> <p>5 A. Yes.</p> <p>6 Q. Why did you retake the test?</p> <p>7 A. Because I wanted a better score.</p> <p>8 Q. Did you retake any of the bagrut tests</p> <p>9 other than English?</p> <p>10 A. No.</p> <p>11 Q. Look at the second page, if you will,</p> <p>12 ma'am.</p> <p>13 This one is written primarily in Hebrew,</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. What's the date of this one?</p> <p>17 A. February 3, 2003.</p> <p>18 Q. This one is actually dated before the</p> <p>19 first page of the exhibit, right?</p> <p>20 A. Yes.</p> <p>21 Q. Does this letter indicate that you were</p>
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<p>1 Ariel University?</p> <p>2 A. Yes.</p> <p>3 Q. Did you take the bagrut tests more than</p> <p>4 once?</p> <p>5 A. I don't understand the question.</p> <p>6 Q. I understand that there are multiple</p> <p>7 subjects, right?</p> <p>8 A. Yes.</p> <p>9 Q. There's a math test and a science test and</p> <p>10 so forth. Did you take the math test more than</p> <p>11 once?</p> <p>12 A. No.</p> <p>13 Q. Did you take any of the same subject</p> <p>14 matter tests more than once?</p> <p>15 A. Yes.</p> <p>16 Q. Which ones?</p> <p>17 A. English.</p> <p>18 Q. How did you do the first time you took the</p> <p>19 English test?</p> <p>20 A. Not good.</p> <p>21 Q. Did you pass?</p>	<p>1 not being cooperative with your sessions with</p> <p>2 Dr. Velkes?</p> <p>3 MR. STEINER: Objection.</p> <p>4 THE WITNESS: Can I just read it</p> <p>5 first?</p> <p>6 BY MR. HILL:</p> <p>7 Q. Of course.</p> <p>8 A. Thank you.</p> <p>9 (Pause)</p> <p>10 THE WITNESS: What was the question?</p> <p>11 BY MR. HILL:</p> <p>12 Q. The letter is in Hebrew but does the</p> <p>13 Hebrew that's written in the letter indicate you</p> <p>14 were not cooperating in your sessions with</p> <p>15 Dr. Velkes?</p> <p>16 A. No.</p> <p>17 Q. What does it say about your level of</p> <p>18 cooperation?</p> <p>19 A. Doesn't say anything about my cooperation.</p> <p>20 With her?</p> <p>21 Q. Yes, ma'am.</p>

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<p>1 A. Doesn't say anything.</p> <p>2 Q. Were you, in fact, uncooperative in your</p> <p>3 sessions with Dr. Velkes?</p> <p>4 A. What does that mean? She asked me</p> <p>5 questions and I answered?</p> <p>6 Q. Yes, ma'am.</p> <p>7 A. Yes.</p> <p>8 Q. We had an exchange that might have been</p> <p>9 characterized by some as being uncooperative.</p> <p>10 A. I'm sorry?</p> <p>11 MR. STEINER: Objection.</p> <p>12 BY MR. HILL:</p> <p>13 Q. We had an exchange earlier that might be</p> <p>14 characterized by some people as being uncooperative.</p> <p>15 MR. STEINER: Objection.</p> <p>16 BY MR. HILL:</p> <p>17 Q. Did you and Dr. Velkes ever disagree in</p> <p>18 the fashion you and I did earlier today?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: Ask it again.</p> <p>21 BY MR. HILL:</p>	<p>1 Q. Can you remember walking out of any other</p> <p>2 therapy sessions you had?</p> <p>3 A. No.</p> <p>4 Q. Do you remember attending family therapy</p> <p>5 with someone named Hazel Semel?</p> <p>6 A. Yes.</p> <p>7 Q. Do you remember walking out of those</p> <p>8 sessions?</p> <p>9 A. I don't remember.</p> <p>10 Q. If your mother testified you walked out of</p> <p>11 those sessions do you think she is inaccurate in</p> <p>12 that testimony?</p> <p>13 A. No. She probably just remembers more than</p> <p>14 I do.</p> <p>15 MR. STEINER: Objection.</p> <p>16 BY MR. HILL:</p> <p>17 Q. Do you remember meeting with Hazel Semel?</p> <p>18 A. Yes.</p> <p>19 Q. On how many occasions did you meet with</p> <p>20 her?</p> <p>21 A. I don't remember.</p>
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<p>1 Q. Did you ever decline to give Dr. Velkes</p> <p>2 reasons for your feelings as you did with me earlier</p> <p>3 today?</p> <p>4 MR. STEINER: Objection.</p> <p>5 THE WITNESS: Say it again.</p> <p>6 BY MR. HILL:</p> <p>7 Q. Did you ever decline to tell --</p> <p>8 A. What's "decline"?</p> <p>9 Q. Refuse to tell Dr. Velkes why you were</p> <p>10 feeling a certain way?</p> <p>11 MR. STEINER: Objection.</p> <p>12 THE WITNESS: Yes.</p> <p>13 BY MR. HILL:</p> <p>14 Q. Did you ever walk out of a session with</p> <p>15 Dr. Velkes?</p> <p>16 A. Not that I remember.</p> <p>17 Q. You believe you completed every session</p> <p>18 you started with her?</p> <p>19 MR. STEINER: Objection.</p> <p>20 THE WITNESS: I don't remember.</p> <p>21 BY MR. HILL:</p>	<p>1 Q. Was it more than once?</p> <p>2 A. Yes.</p> <p>3 Q. Who was present at those sessions?</p> <p>4 A. My mother and my siblings.</p> <p>5 Q. Do you think it was more than twice that</p> <p>6 you had these meetings with Semel?</p> <p>7 A. I don't know.</p> <p>8 Q. Do you remember anything about those</p> <p>9 sessions?</p> <p>10 A. What?</p> <p>11 Q. Do you remember what happened in those</p> <p>12 sessions?</p> <p>13 A. Not really.</p> <p>14 Q. Do you remember speaking in those</p> <p>15 sessions?</p> <p>16 A. I think so.</p> <p>17 Q. What do you remember saying?</p> <p>18 A. I don't know.</p> <p>19 Q. Can you remember anything you said in the</p> <p>20 sessions with Ms. Semel?</p> <p>21 A. No.</p>

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<p>1 Q. Can you remember what anyone else said in</p> <p>2 those sessions?</p> <p>3 A. No.</p> <p>4 Q. Look at the last letter in this package.</p> <p>5 A. Where is this Mrs. Semel?</p> <p>6 (Pause)</p> <p>7 BY MR. HILL:</p> <p>8 Q. If you look at the first paragraph, this</p> <p>9 one is in English, right?</p> <p>10 A. Yes.</p> <p>11 Q. This is also from Dr. Velkes, right?</p> <p>12 A. Yes.</p> <p>13 Q. It says I first consulted with Chani in</p> <p>14 2002, several months after she had been injured in a</p> <p>15 terror attack in which she lost her very best friend</p> <p>16 and one other time. She was at that time, at the</p> <p>17 time quite resistant to any formal therapy but it</p> <p>18 was clear to me in addition to the psychological</p> <p>19 effect of this injury she was also suffering extreme</p> <p>20 guilt at the loss of her friends.</p> <p>21 A. Yes.</p>	<p>1 A. In school. No, actually I think I was</p> <p>2 offered and I didn't participate at the end.</p> <p>3 I remember I was offered but I didn't</p> <p>4 participate.</p> <p>5 Q. Where were you offered these group work</p> <p>6 sessions?</p> <p>7 A. At school.</p> <p>8 Q. You declined?</p> <p>9 A. I think so. I don't remember.</p> <p>10 Q. Do you have any memory of participating in</p> <p>11 such a group work session?</p> <p>12 A. No, I don't remember.</p> <p>13 Q. Your best recollection is that you</p> <p>14 declined that invitation?</p> <p>15 A. I don't know, I don't remember. I</p> <p>16 remember I was offered and that's it.</p> <p>17 Q. Do you remember why you didn't do it?</p> <p>18 A. Because I rejected any -- I didn't want to</p> <p>19 talk about it.</p> <p>20 Q. Is it fair to say that at the time that</p> <p>21 Dr. Velkes recommended that you do the group work</p>
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<p>1 Q. Do you agree with Dr. Velkes' assessment</p> <p>2 that you were at the time quite resistant to any</p> <p>3 form of therapy?</p> <p>4 A. Yes.</p> <p>5 Q. That's an accurate statement?</p> <p>6 A. Any formal therapy that has to do with</p> <p>7 2002?</p> <p>8 Q. Yes, ma'am. It is the case that in 2002</p> <p>9 you were quite resistant to any formal therapy with</p> <p>10 Dr. Velkes, right?</p> <p>11 A. I didn't want to go see her.</p> <p>12 Q. In the next paragraph, the second sentence</p> <p>13 says: I saw Chani again on a later occasion and</p> <p>14 recommended she participate in a group work with</p> <p>15 other children who had suffered injury and loss. Do</p> <p>16 you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Did you, in fact, participate in such</p> <p>19 group work sessions?</p> <p>20 A. Yes.</p> <p>21 Q. Where did those take place?</p>	<p>1 sessions you refused to do so?</p> <p>2 A. I don't know if I refused or I did it and</p> <p>3 then I left. I don't remember. There was something</p> <p>4 there. I don't remember.</p> <p>5 Q. Can you remember even beginning a group</p> <p>6 work session?</p> <p>7 A. No.</p> <p>8 Q. Is it fair to say your best recollection</p> <p>9 is that you didn't want to do that and didn't do it?</p> <p>10 MR. STEINER: Objection.</p> <p>11 THE WITNESS: I didn't want, yes. I</p> <p>12 don't know if I didn't.</p> <p>13 BY MR. HILL:</p> <p>14 Q. You do remember not wanting to do the</p> <p>15 group sessions, right?</p> <p>16 A. Yes.</p> <p>17 MR. STEINER: Objection.</p> <p>18 BY MR. HILL:</p> <p>19 Q. You just can't remember if you did it</p> <p>20 anyway, right?</p> <p>21 A. Yes.</p>

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<p>1 Q. The next sentence says: During this</p> <p>2 period of time the family also sought brief family</p> <p>3 counseling with a Mrs. Hazel Semel. Do you see</p> <p>4 that?</p> <p>5 A. Yes.</p> <p>6 Q. It says Chani remained uncooperative,</p> <p>7 right?</p> <p>8 A. Yes.</p> <p>9 Q. Is that a true statement, that you were</p> <p>10 uncooperative in that family counseling with</p> <p>11 Ms. Semel?</p> <p>12 A. I don't remember.</p> <p>13 Q. Do you have any reason to think anything</p> <p>14 Dr. Velkes said here is inaccurate?</p> <p>15 A. What?</p> <p>16 Q. Do you have any reason to think that what</p> <p>17 Dr. Velkes wrote here is inaccurate?</p> <p>18 A. No.</p> <p>19 MR. STEINER: Objection.</p> <p>20 BY MR. HILL:</p> <p>21 Q. Do you believe you told Dr. Velkes that</p>	<p>1 receive one?</p> <p>2 A. No.</p> <p>3 Q. You felt like you might need a tutor but</p> <p>4 you never asked for one?</p> <p>5 A. I did. I went to another tutor.</p> <p>6 Q. You had another tutor as well?</p> <p>7 A. Yes.</p> <p>8 Q. What was the name of your tutor?</p> <p>9 A. In the other subject?</p> <p>10 Q. Yes.</p> <p>11 A. Tsipi something, Tsipi Sharabi.</p> <p>12 Q. In what subjects did Tsipi Sharabi teach?</p> <p>13 A. Hebrew.</p> <p>14 Q. Who tutored you in math and geometry?</p> <p>15 A. Rochelle.</p> <p>16 Q. Do you know her last name?</p> <p>17 A. Ben David.</p> <p>18 Q. Did you have any other duties?</p> <p>19 A. Not that I could think of.</p> <p>20 Q. Did you need a tutor in any of the</p> <p>21 subjects?</p>
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<p>1 you were uncooperative with the family counseling</p> <p>2 with Ms. Semel?</p> <p>3 A. I don't know.</p> <p>4 Q. If you look at the last paragraph on this</p> <p>5 page it says: She needs help, especially in</p> <p>6 mathematics and geometry, and I would recommend that</p> <p>7 she has a private tutor to help her get through this</p> <p>8 so she can attend university?</p> <p>9 A. Yes.</p> <p>10 Q. Did you ever get a private tutor as</p> <p>11 Dr. Velkes recommended?</p> <p>12 A. Yes.</p> <p>13 Q. Did that help you --</p> <p>14 A. Yes.</p> <p>15 Q. Did that help you with your mathematics</p> <p>16 and geometry?</p> <p>17 A. I guess, a little.</p> <p>18 Q. Do you feel like you needed a private</p> <p>19 tutor in any other subjects?</p> <p>20 A. Yes.</p> <p>21 Q. Did you ever ask for a tutor and not</p>	<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: I don't know.</p> <p>3 BY MR. HILL:</p> <p>4 Q. Do you recall at the time thinking you</p> <p>5 needed additional tutors?</p> <p>6 A. No.</p> <p>7 Q. Did you ever ask for help from your school</p> <p>8 and not receive?</p> <p>9 A. I don't remember.</p> <p>10 Q. Apart from the group work sessions do you</p> <p>11 remember being offered help at school and declining</p> <p>12 it?</p> <p>13 A. I think so.</p> <p>14 Q. What other help can you remember being</p> <p>15 offered, help that was offered by the school and you</p> <p>16 turned down?</p> <p>17 A. She is like in charge of -- I don't know.</p> <p>18 Q. The school principal?</p> <p>19 A. Yes.</p> <p>20 Q. Someone who is in charge of helping</p> <p>21 students?</p>

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<p>1 A. I guess so.</p> <p>2 Q. The person in charge of helping students</p> <p>3 offered you some help?</p> <p>4 A. Yes.</p> <p>5 Q. What kind of help was offered to you?</p> <p>6 A. To talk to her.</p> <p>7 Q. This is like a school counselor?</p> <p>8 A. Maybe.</p> <p>9 Q. The school counselor offered to let you</p> <p>10 talk to her and you said no thanks?</p> <p>11 A. Yes.</p> <p>12 Q. Any other help that was offered to you at</p> <p>13 school that you declined?</p> <p>14 A. Not that I can remember.</p> <p>15 Q. If you look at the last page of this</p> <p>16 exhibit, the last sentence, it says I believe with</p> <p>17 the correct help psychologically and academically</p> <p>18 she can lead in the future a productive and healthy</p> <p>19 life?</p> <p>20 A. Yes.</p> <p>21 Q. This last letter is dated January 2, 2005,</p>	<p>1 Q. Whose idea was it for you to go see Miriam</p> <p>2 Shapiro?</p> <p>3 A. I don't know.</p> <p>4 Q. You got married in January of 2008, right?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know approximately in what month in</p> <p>7 2007 you started to see Miriam Shapiro?</p> <p>8 A. No.</p> <p>9 Q. Do you remember was it before or after</p> <p>10 your engagement?</p> <p>11 A. Before.</p> <p>12 Q. What month were you engaged in?</p> <p>13 A. Maybe September, October.</p> <p>14 Q. Do you remember approximately how far in</p> <p>15 advance of your engagement you started seeing</p> <p>16 Ms. Shapiro?</p> <p>17 A. What?</p> <p>18 Q. Do you remember how many months before</p> <p>19 your engagement you started see Ms. Shapiro?</p> <p>20 A. No.</p> <p>21 Q. Do you know on how many occasions you met</p>
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<p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. Did you receive any additional</p> <p>4 psychological help after January 2, 2005?</p> <p>5 A. Yes.</p> <p>6 Q. From whom did you receive it?</p> <p>7 A. Miriam Shapiro.</p> <p>8 Q. When did you first start to see Miriam</p> <p>9 Shapiro?</p> <p>10 A. I think in 2007.</p> <p>11 Q. Between 2005 and 2007 do you recall you</p> <p>12 had any mental health treatment at all?</p> <p>13 A. No, not that I remember.</p> <p>14 Q. How long did you see Miriam Shapiro?</p> <p>15 A. I don't remember.</p> <p>16 Q. Did you see her after you were married?</p> <p>17 A. No.</p> <p>18 Q. Why did you start going to see Miriam</p> <p>19 Shapiro?</p> <p>20 A. Because I wanted to take care of all this</p> <p>21 from 2002 in order to get married.</p>	<p>1 with Ms. Shapiro?</p> <p>2 A. What does that mean?</p> <p>3 Q. How many times did you go see her?</p> <p>4 A. No.</p> <p>5 Q. How frequently were you seeing her in that</p> <p>6 time period?</p> <p>7 A. Maybe once a week or once in two weeks.</p> <p>8 Q. Did those appointments continue up until</p> <p>9 your wedding in January 2008?</p> <p>10 A. No.</p> <p>11 Q. How far in advance of your wedding did you</p> <p>12 stop seeing Dr. Shapiro?</p> <p>13 A. I don't remember.</p> <p>14 Q. Was it more than a month?</p> <p>15 A. It was before my engagement.</p> <p>16 Q. You saw her before you were engaged and</p> <p>17 stopped seeing her before you engaged?</p> <p>18 A. Once I was engaged I stopped.</p> <p>19 Q. All the sessions with Miriam Shapiro were</p> <p>20 in 2007 before your engagement?</p> <p>21 A. Yes.</p>

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<p style="text-align: right;">Page 94</p> <p>1 Q. The engagement was September?</p> <p>2 A. Or October.</p> <p>3 Q. What's your best estimate of what month in</p> <p>4 2007 you started seeing Miriam Shapiro?</p> <p>5 A. I have no idea.</p> <p>6 Q. Spring, was it winter, summer, any idea?</p> <p>7 A. I don't remember.</p> <p>8 Q. When you had your last session with Miriam</p> <p>9 Shapiro did you and she discuss whether you should</p> <p>10 have future treatment?</p> <p>11 A. No.</p> <p>12 Q. Did you and she ever discuss whether you</p> <p>13 should have future treatment?</p> <p>14 A. I don't think so.</p> <p>15 Q. Did Ms. Shapiro consider your work to be</p> <p>16 done as far as she was concerned?</p> <p>17 MR. STEINER: Objection.</p> <p>18 THE WITNESS: I don't know.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Did she tell you?</p> <p>21 A. I don't know.</p>	<p style="text-align: right;">Page 96</p> <p>1 A. No.</p> <p>2 Q. Have you had any sort of counseling or</p> <p>3 coaching or classes or anything like that pertaining</p> <p>4 to your personal life since 2007?</p> <p>5 A. What does "classes" mean?</p> <p>6 Q. I'm trying to be as broad as possible.</p> <p>7 Any kind of help for your personal life since 2007</p> <p>8 by any person who, other than a friend or family</p> <p>9 member, some sort of formalized help for you in any</p> <p>10 way.</p> <p>11 MR. STEINER: Objection.</p> <p>12 THE WITNESS: I don't know what's</p> <p>13 "help."</p> <p>14 BY MR. HILL:</p> <p>15 Q. Have you had any marital counseling?</p> <p>16 A. No.</p> <p>17 Q. Any parenting classes?</p> <p>18 A. Yes.</p> <p>19 Q. When did you have the parenting classes?</p> <p>20 A. A month ago.</p> <p>21 Q. Why did you have those?</p>
<p style="text-align: right;">Page 95</p> <p>1 Q. You said that you wanted to take care of</p> <p>2 this in 2002 in order to get married.</p> <p>3 Do you believe that Ms. Shapiro helped you</p> <p>4 do that?</p> <p>5 A. She helped me to get to a point where I</p> <p>6 can get married.</p> <p>7 Q. Do you anticipate that you will need</p> <p>8 future medical treatment as a result of the bombing</p> <p>9 in February 2002?</p> <p>10 A. I don't know.</p> <p>11 Q. Do you believe you will need future mental</p> <p>12 health treatment?</p> <p>13 A. I don't know.</p> <p>14 Q. Sitting here today do you plan to have any</p> <p>15 future mental health treatment?</p> <p>16 A. Right now?</p> <p>17 Q. Yes.</p> <p>18 A. I don't know.</p> <p>19 Q. Have you had any other sort of mental</p> <p>20 health treatment since you stopped seeing Miriam</p> <p>21 Shapiro in 2007?</p>	<p style="text-align: right;">Page 97</p> <p>1 A. Because I wanted to.</p> <p>2 Q. This was something you had decided to do?</p> <p>3 A. It's a group. It's a class.</p> <p>4 Q. Did anyone tell you you should enroll in</p> <p>5 this class?</p> <p>6 A. No.</p> <p>7 Q. This was something you decided to do on</p> <p>8 your own?</p> <p>9 A. Yes.</p> <p>10 Q. How many of the parenting classes did you</p> <p>11 attend?</p> <p>12 A. Four.</p> <p>13 Q. Have you completed the sessions that you</p> <p>14 signed up for?</p> <p>15 A. No.</p> <p>16 Q. Are they ongoing?</p> <p>17 A. Yes.</p> <p>18 Q. How long do you expect they'll continue?</p> <p>19 A. Depends. I'm missing now. I'm going to</p> <p>20 have about maybe two more.</p> <p>21 Q. What's the general subject matter of these</p>

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<p>1 parenting classes that you are attending?</p> <p>2 A. To be patient with your kids, to know how</p> <p>3 to listen to your child and make your child listen</p> <p>4 to you.</p> <p>5 Q. Have they been helpful for you?</p> <p>6 MR. STEINER: Objection.</p> <p>7 THE WITNESS: Yes.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Do you believe that the need to take</p> <p>10 parenting classes is related in any way to the</p> <p>11 bombing in February 2002?</p> <p>12 A. Ask the question again.</p> <p>13 Q. Do you believe that you needed to take</p> <p>14 those parenting classes because of the bombing in</p> <p>15 February 2002?</p> <p>16 A. Yes.</p> <p>17 Q. Why?</p> <p>18 A. Because I'm impatient with my children.</p> <p>19 Q. Do you believe that the impatience with</p> <p>20 your children is related to the bombing?</p> <p>21 A. Yes.</p>	<p>1 Q. Do you expect to take additional parenting</p> <p>2 classes after these conclude?</p> <p>3 A. I don't know.</p> <p>4 Q. Are you asking to be paid money in the</p> <p>5 lawsuit for the cost of the parenting classes?</p> <p>6 A. I'm sorry?</p> <p>7 Q. Are you asking to be paid money in this</p> <p>8 lawsuit for the cost of the parenting classes?</p> <p>9 MR. STEINER: Objection.</p> <p>10 THE WITNESS: I don't understand the</p> <p>11 question. Are they paying me?</p> <p>12 BY MR. HILL:</p> <p>13 Q. You understand that you are here because</p> <p>14 you are a plaintiff in a lawsuit, right?</p> <p>15 A. Yes.</p> <p>16 Q. Do you understand that means you are</p> <p>17 asking people to pay you money?</p> <p>18 A. Yes.</p> <p>19 Q. Is part of the money that you want to be</p> <p>20 paid the cost of the parenting classes you</p> <p>21 described?</p>
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<p>1 Q. In what way?</p> <p>2 A. Since then I'm impatient and I'm very</p> <p>3 nervous and upset very quickly.</p> <p>4 Q. Since 2002 you are saying?</p> <p>5 A. Since February 16, 2002.</p> <p>6 Q. Apart from taking parenting classes have</p> <p>7 you done anything else since 2007 to address the</p> <p>8 nervousness or impatience you just described?</p> <p>9 A. No.</p> <p>10 Q. Apart from completing the parenting</p> <p>11 classes that you are currently enrolled in, do you</p> <p>12 expect to have any other training or treatment or</p> <p>13 coaching or anything like that related to your</p> <p>14 children?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: I don't know.</p> <p>17 BY MR. HILL:</p> <p>18 Q. You are not presently anticipating</p> <p>19 anything else, is that fair to say?</p> <p>20 A. Right now. Let me finish with what I'm</p> <p>21 doing and then I'll see.</p>	<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: I don't know.</p> <p>3 BY MR. HILL:</p> <p>4 Q. You don't know if you are asking for that?</p> <p>5 A. No.</p> <p>6 Q. Did they cost you anything?</p> <p>7 A. Yes.</p> <p>8 Q. How much did they cost you?</p> <p>9 A. 300 and something shekels.</p> <p>10 Q. For each class?</p> <p>11 A. No.</p> <p>12 Q. For all of them together?</p> <p>13 A. Yes.</p> <p>14 Q. Apart from the 300 and something shekels</p> <p>15 that you spent on the parenting classes, have you</p> <p>16 incurred any cost for any treatment that you believe</p> <p>17 is related to the February 16, 2002 bombing?</p> <p>18 A. What?</p> <p>19 Q. Apart from the cost of the parenting</p> <p>20 classes, have you spent any money for any treatment</p> <p>21 that you believe is related to the injuries you</p>

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1 received in February 2002?

2 **A. No.**

3 Q. I'd like to ask you now about the events
4 of February 16, 2002.

5 I understand you were present at an
6 explosion that occurred that day in Karnei Shomron,
7 is that right?

8 **A. Yes.**

9 Q. Did you lose consciousness after that
10 explosion?

11 **A. No.**

12 MR. STEINER: Objection. I ask you
13 to be more specific about the timeframe after the
14 explosion.

15 BY MR. HILL:

16 Q. You eventually went to the hospital that
17 night, right?

18 **A. Yes.**

19 Q. Do you believe you were conscious between
20 the time of the explosion and the time that you got
21 to the hospital?

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1 **A. Yes.**

2 Q. Were you sedated at some point that
3 evening?

4 **A. Sorry?**

5 Q. Were you sedated at --

6 **A. What's "sedated"?**

7 Q. Were you given medicine that caused you to
8 pass out or fall asleep?

9 **A. Yes.**

10 Q. When did that happen?

11 **A. I don't know.**

12 Q. Was it at the hospital?

13 **A. Yes.**

14 Q. Did you see the person or persons who
15 caused the explosion before the explosion took
16 place?

17 **A. Yes.**

18 Q. How many persons were involved in causing
19 the explosion?

20 **A. I don't know how many persons were**
21 **involved. I saw the person, one person that I saw.**

1 Q. Had you ever seen this person before?

2 **A. No.**

3 Q. Are you able to tell me the name of the
4 person you saw who caused the explosion?

5 **A. No.**

6 Q. Has anyone ever asked you to identify the
7 person who caused the explosion?

8 **A. No.**

9 Q. Can you describe the person who caused the
10 explosion?

11 **A. A dark man, dark colored man I guess you**
12 **could say, wearing dark clothing and he had a dark**
13 **jacket, he had a backpack.**

14 Q. Can you tell me how tall this man was?

15 **A. No.**

16 Q. Can you tell me his approximate weight?

17 **A. No.**

18 Q. Can you tell me his hair color?

19 **A. Dark.**

20 Q. Can you tell me if he had any facial hair?

21 **A. No.**

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1 Q. Can you tell me if he was wearing glasses?

2 **A. No.**

3 Q. Have you now told me everything you can
4 about the physical description of this individual?

5 **A. That I remember, yes.**

6 Q. Did the person say anything?

7 **A. No, not that I heard.**

8 Q. You cannot recollect this person who
9 caused the explosion saying anything, correct?

10 **A. Yes.**

11 Q. How far were you from the person at the
12 time of the explosion?

13 **A. I don't know.**

14 Q. Was anyone near you at the time of the
15 explosion?

16 **A. Yes. What does "near" mean?**

17 Q. Within five feet of you.

18 **A. What's five feet? Can you show me?**

19 Q. Within two meters of you. Do you know
20 what two meters is?

21 **A. I'm really bad at that stuff.**

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1 Q. Was anyone sitting as close to you as you
2 and I are sitting now?

3 A. Yes.

4 Q. Who was within the radius that you and I
5 are currently?

6 A. Rachel Thaler.

7 Q. Anyone else?

8 A. Maya something.

9 MR. STEINER: Perhaps we should give
10 some sort of mention of how wide the table is.

11 MR. HILL: I'll do the examination.

12 That's fine.

13 BY MR. HILL:

14 Q. You were sitting at a table at the time
15 the explosion went off?

16 A. Yes.

17 Q. You mentioned that Rachel Thaler and Maya
18 were at the table with you?

19 A. Yes.

20 Q. Were they also seated?

21 A. Yes.

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1 Q. From which direction did the explosion
2 come?

3 A. The left.

4 Q. Ms. Thaler, was she seated on your left or
5 your right or across from you?

6 A. I think across. I'm not sure.

7 Q. You were sitting at a square table?

8 A. Yes.

9 Q. How many chairs were around the square
10 table?

11 A. Four.

12 Q. Your best recollection is that Ms. Thaler
13 was sitting across the table from you?

14 A. Yes, or across like that.

15 MR. STEINER: Diagonally.

16 THE WITNESS: It was four chairs. I
17 was sitting here. He came in from here and she was
18 here or here.

19 I don't remember. I think. Maybe she
20 was here. I don't remember.

21 MR. STEINER: Indicating he came from

1 her left and she was in front of where the witness
2 was sitting.

3 BY MR. HILL:

4 Q. Is it fair to say that you cannot
5 recollect whether Ms. Thaler was sitting across the
6 table from you or beside you at the table?

7 A. I think she wasn't beside me.

8 Q. She was across from you?

9 A. Across or like that.

10 Q. You believe Ms. Thaler was either sitting
11 on your left or directly across from you?

12 A. I don't think she was on my left.

13 Q. You believe she was sitting on your right?

14 A. No. I don't know how you say it in

15 English. Like that. There's across --

16 Q. Let's do this. I'm going to hand you a
17 blank sheet of paper. Would you draw a square
18 representing the table?

19 A. Yes.

20 Q. Would you draw four other squares
21 representing seats around the table?

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1 A. Yes.

2 Q. Would you draw a C where you believe you
3 were sitting?

4 A. I think here. I think here or maybe here.

5 Q. Maybe you can put a C in both chairs where
6 you think you may have been seated.

7 A. Yes.

8 Q. You were seated in one or the other, you
9 just can't remember which one?

10 A. Yes.

11 Q. Can you draw an R in the chair that you
12 believe Rachel Thaler was seated in?

13 A. Yes.

14 Q. Can you draw an M where you think Maya was
15 seated?

16 A. Here, maybe here or here.

17 Q. Could you draw an X in the direction where
18 the blast came from?

19 A. I know that now. I didn't know that then.

20 Q. Are you saying that at the time of the
21 explosion you did not know from which direction the

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1 explosion came?

2 **A. It came somewhere from here because I saw**
3 **him going here.**

4 **He came in from here. He went this**
5 **direction. I heard just boom, a big one.**

6 Q. The table that you were sitting in was at
7 a restaurant, right?

8 **A. Pizzeria.**

9 Q. Were you closest to the exit or were you
10 closest to the back of the restaurant?

11 **A. It's not a restaurant. It's not a closed**
12 **restaurant.**

13 **It's an open mall where there's a pizzeria**
14 **and there are nine tables. I was where you go out**
15 **to the street but there's different ways to go out**
16 **to the street because it's an open area.**

17 Q. The table you were seated at was the
18 closest to the street, right?

19 **A. Yes.**

20 Q. When the bomb was detonated was the bomb
21 behind you in the pizzeria or was it out toward the

1 **A. I saw him coming from my left.**

2 Q. Were you injured more severely on your
3 left side than your right side?

4 **A. What?**

5 Q. I understand you had some hearing loss as
6 a result of this?

7 **A. Yes.**

8 Q. Which ear did you have the hearing loss
9 in?

10 **A. My left.**

11 Q. Are you able to say whether Rachel Thaler
12 was to the right of you or to the left of you?

13 **A. I don't know.**

14 Q. She was sitting across the table from you?

15 **A. What I remember.**

16 Q. She wasn't sitting beside you as
17 Mr. Steiner is sitting beside you now, right?

18 **A. No, I don't think so. I don't remember.**

19 Q. I understand that after the explosion
20 there was a period when it was silent, is that
21 right?

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1 street?

2 **A. It was where I was sitting, the area of**
3 **the tables.**

4 Q. The explosion occurred within the nine
5 tables that you've described?

6 **A. Yes.**

7 Q. Was the person sitting down at a table?

8 **A. Which person?**

9 Q. The person who caused the explosion.

10 **A. I don't know.**

11 Q. The explosion occurred --

12 **A. I didn't see anything. I wasn't full**
13 **conscious.**

14 **I don't know what to tell you where he blew**
15 **himself up. I don't know.**

16 Q. Do you know where the explosion took place
17 that night?

18 **A. Somewhere where I was sitting. I saw**
19 **black.**

20 Q. You said earlier that you believe it came
21 from your left.

1 **A. What's that?**

2 Q. How long did the period of silence last?

3 **A. I don't know.**

4 Q. But you do remember there being a silence
5 after the blast?

6 **A. Yes.**

7 Q. Then after the blast there was a lot of
8 yelling and screaming?

9 **A. I don't remember hearing that.**

10 **I first remember hearing Rachel screaming.**

11 **I heard her screaming very, very loud and as I ran**
12 **out to the street I remember seeing a big mess and I**
13 **don't remember hearing things.**

14 **I don't know.**

15 Q. There was a period of silence and then you
16 believe you heard Rachel Thaler screaming?

17 **A. Yes.**

18 Q. Were you able to see Rachel Thaler while
19 she was screaming?

20 **A. No.**

21 Q. From what direction was the screaming you

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1 were hearing coming from?

2 **A. I don't remember.**

3 Q. Maya was also sitting across the table
4 from you next to Rachel?

5 **A. I don't remember. I don't know.**

6 Q. Maya was also injured in this blast,
7 right?

8 **A. Yes.**

9 Q. What were the nature of her injuries?

10 **A. I don't know.**

11 Q. Do you know was Maya able to scream after
12 the blast?

13 **A. I don't know.**

14 Q. Do you know if you heard Maya screaming
15 after the blast?

16 **A. I just remember hearing Rachel screaming.**
17 **I don't remember anything else.**

18 Q. What makes you think it was Rachel that
19 you heard screaming as opposed to Maya or someone
20 else?

21 **A. Because I know her voice. I've known her**

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1 **for a while.**

2 Q. Was she saying words that you could
3 recognize?

4 **A. Not that I remember.**

5 Q. Had you heard her scream on prior
6 occasions?

7 **A. Screaming maybe in laughter. I don't know**
8 **if in pain, no.**

9 Q. Apart from your belief that it was her
10 voice because you were friends, is there anything
11 else that makes you think it was her as opposed to
12 someone else?

13 MR. STEINER: Objection.

14 THE WITNESS: I know my friend. I
15 know her voice.

16 BY MR. HILL:

17 Q. Is there anything else that makes you
18 think it was her as opposed to someone else that you
19 heard screaming that night?

20 MR. STEINER: Objection.

21 THE WITNESS: I don't remember

1 hearing anyone else screaming.

2 BY MR. HILL:

3 Q. Are you saying that you only heard one
4 person scream after the --

5 **A. That's what I remember.**

6 MR. STEINER: Objection.

7 THE WITNESS: I believe there was
8 more screaming but then I tried talking to her to
9 tell her to come with me but I don't remember
10 anything.

11 BY MR. HILL:

12 Q. After the blast when you heard screaming
13 you tried speaking to Rachel, right?

14 **A. Yes. I wasn't able to. I tried talking.**
15 **It didn't come out.**

16 Q. You remember trying to speak but you were
17 unable to speak?

18 **A. Yes.**

19 Q. Were you injured in your throat or mouth
20 in any fashion?

21 **A. No.**

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1 Q. Do you know why you were unable to speak
2 at that time?

3 **A. No.**

4 Q. Were you able to speak later that evening?

5 **A. Yes.**

6 Q. After the bomb went off did you see anyone
7 in the pizzeria?

8 **A. No, I couldn't see anything.**

9 Q. When do you recall being able to see after
10 the explosion the next time?

11 MR. STEINER: Objection.

12 THE WITNESS: When I ran out.

13 BY MR. HILL:

14 Q. Where did you run to?

15 **A. I was trying to run home and cross the**
16 **street and the bus almost ran me over.**

17 **The bus driver came out and asked me what**
18 **happened. I pointed to him and told him there was**
19 **an attack and he told me to come up to the bus and I**
20 **asked him to please take me home to my address and I**
21 **was screaming because I started feeling very, very**

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<p>1 hot.</p> <p>2 He took me to the ambulance station.</p> <p>3 Q. Approximately how far did you walk or run</p> <p>4 from the pizzeria to the point where you encountered</p> <p>5 the bus as you've described it?</p> <p>6 A. I don't know how to tell you meters, feet,</p> <p>7 I don't know.</p> <p>8 Q. Was it on the road in front of the</p> <p>9 pizzeria where you encountered the bus?</p> <p>10 A. No. The bus was one road and another</p> <p>11 road.</p> <p>12 Q. Were you approximately two blocks from the</p> <p>13 pizzeria?</p> <p>14 A. Not blocks, no. I don't know.</p> <p>15 Q. You had walked or run some distance by the</p> <p>16 time you --</p> <p>17 A. It's not that far.</p> <p>18 Q. Is it longer than the length of this room?</p> <p>19 A. Yes.</p> <p>20 Q. Approximately twice the length of this</p> <p>21 room?</p>	<p>1 Q. Did they put you in an ambulance?</p> <p>2 A. I think I went alone to the ambulance.</p> <p>3 Q. Did the ambulance take you to a hospital?</p> <p>4 A. Yes.</p> <p>5 Q. Which hospital?</p> <p>6 A. Schneider.</p> <p>7 Q. Did you go to the emergency room at</p> <p>8 Schneider?</p> <p>9 A. I don't know.</p> <p>10 Q. Do you have any gaps in your memory</p> <p>11 anywhere between the time of the blast and the time</p> <p>12 of your arrival at Schneider?</p> <p>13 A. What?</p> <p>14 Q. Are there any parts that you can't</p> <p>15 remember between the time of the blast and the time</p> <p>16 of your arrival at the Schneider Hospital?</p> <p>17 A. I remember being in an ambulance and I</p> <p>18 remember hearing them talking, asking me questions.</p> <p>19 I don't remember getting into the hospital. I</p> <p>20 remember being in the hospital. I don't remember</p> <p>21 getting in.</p>
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<p>1 A. I don't know.</p> <p>2 Q. When you encountered the bus and the</p> <p>3 driver stopped were you able to speak to the driver?</p> <p>4 A. Yes.</p> <p>5 Q. Did the driver give you aid?</p> <p>6 A. What?</p> <p>7 Q. Did he give you aid?</p> <p>8 A. What is that?</p> <p>9 Q. Did he help you?</p> <p>10 A. I don't remember.</p> <p>11 Q. You got on the bus?</p> <p>12 A. Yes.</p> <p>13 Q. Where did he take you?</p> <p>14 A. The ambulance station.</p> <p>15 Q. How far was that?</p> <p>16 A. In ride?</p> <p>17 Q. Yes.</p> <p>18 A. I don't know. Three, four minutes.</p> <p>19 Q. Once you got to the ambulance station were</p> <p>20 there medical personnel there?</p> <p>21 A. Yes.</p>	<p>1 Q. It's possible you may have lost</p> <p>2 consciousness at some point in the ambulance?</p> <p>3 A. I don't remember, I just can't remember.</p> <p>4 Q. At some point you got to the hospital and</p> <p>5 at that point they put you under and that sort of</p> <p>6 thing?</p> <p>7 MR. STEINER: Objection.</p> <p>8 THE WITNESS: At some point. I don't</p> <p>9 know.</p> <p>10 BY MR. HILL:</p> <p>11 Q. Can you describe generally the sort of</p> <p>12 injuries you received in the bombing, from the</p> <p>13 blast?</p> <p>14 A. That now I know? Then I didn't know</p> <p>15 anything.</p> <p>16 Q. That you know now, yes, ma'am.</p> <p>17 A. Burned, shrapnel and my eardrum.</p> <p>18 Q. Where were you --</p> <p>19 A. The hole in my hand.</p> <p>20 Q. Where were you burned?</p> <p>21 A. On my feet, face -- foot, face, hand,</p>

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1 lower back.

2 Q. Where did you receive shrapnel?

3 A. I don't know all of them. I know I had it
4 in my breast, eye, top of my head, I think in my
5 stomach.

6 I don't know. I don't remember. I think in
7 my foot maybe.

8 Q. You mentioned you had an injury to your
9 eardrum?

10 A. It popped. I don't know how to say it in
11 English.

12 Q. The left?

13 A. Yes.

14 Q. Was the right eardrum injured?

15 A. I don't know.

16 Q. You mentioned you had a hole in your hand?

17 A. Not a hole. I had a shrapnel. I had a
18 hole in my hand.

19 Q. Did you have a hole in some part of your
20 body?

21 A. I had here like a hole.

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1 MR. HILL: Let's take a short break.

2 (Whereupon, a recess was taken from
3 4:07 p.m. to 4:23 p.m.)

4 BY MR. HILL:

5 Q. Ma'am, before we broke you mentioned that
6 you had a hole in your hand where a piece of
7 shrapnel came in?

8 A. I don't know. I just had a hole there.

9 Q. It was your left hand that had the hole in
10 it?

11 A. Yes.

12 Q. In the palm of your hand?

13 A. Yes.

14 Q. Has it healed?

15 A. I don't know what's healed. I have a
16 scar.

17 Q. Does that injury to your hand affect your
18 ability to use your hand in any way?

19 A. Sometimes when I need to open bottles it's
20 hard for me.

21 Q. To open a twist-off with that hand?

1 A. Yes.

2 Q. Are you right or left-handed?

3 A. Right-handed.

4 Q. This is an injury to your left hand?

5 A. Yes.

6 Q. Do the injuries you received that day, the
7 physical injuries you received that day affect your
8 daily living in any way?

9 A. I'm sorry?

10 Q. Do the physical injuries you received in
11 February of 2002 affect your daily living today?

12 A. Yes.

13 Q. In what way?

14 A. I don't go swimming any more --

15 Q. Any other --

16 A. -- in a bathing suit.

17 Q. Any other way that they affect your daily
18 living?

19 A. Physical?

20 Q. Yes, ma'am.

21 A. I have sometimes in my ear a noise. It

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1 comes and goes.

2 Q. Are you hearing it now?

3 A. No.

4 Q. Any other way that the physical injuries
5 you received affect your daily living today?

6 A. My eye.

7 Q. How is your eye affected?

8 A. My left eye constantly burns me and it
9 hurts me.

10 Q. Your left eye burns?

11 A. It hurts. I don't know. It bothers me a
12 lot.

13 Q. You said the noise in your ear comes and
14 goes?

15 A. Yes.

16 Q. The left ear?

17 A. Yes.

18 Q. Do you have any difficulty hearing in the
19 left ear?

20 A. I don't know. I don't think so.

21 Q. How frequently does the noise that you've

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1 described come?

2 Does the noise in your ear prevent you from
3 doing anything?

4 **A. Yes, I just wait for it -- I stop what I'm**
5 **doing. I wait for it to pass.**

6 Q. How long does it typically last when it
7 comes?

8 **A. I don't know. Maybe a minute. I don't**
9 **know.**

10 Q. How many times a week would you say you
11 have the sensation of the noise in your ear?

12 **A. It's not something steady.**

13 Q. When was the last time you think you had
14 that condition?

15 **A. Maybe a week and a half ago.**

16 Q. How many times a month do you think you
17 have this noise in your ear?

18 **A. I don't know.**

19 Q. Can you remember the time you had it
20 before a week and a half ago?

21 **A. No.**

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1 Q. Is it caused by anything that you are
2 doing?

3 **A. No.**

4 Q. Has anyone ever told you whether you can
5 be treated for that condition?

6 **A. No.**

7 Q. Have you ever asked anyone whether there's
8 anything that can be done to stop the noise in your
9 ear?

10 **A. I don't know.**

11 Q. You mentioned that your left eye
12 occasionally hurts?

13 **A. Yes.**

14 Q. How frequently does your eye hurt?

15 **A. I don't know.**

16 Q. When was the last time you had discomfort
17 in your eye?

18 **A. A few weeks ago.**

19 Q. How long did the discomfort last?

20 **A. A few days, maybe a day. I don't know.**

21 Q. Did you do anything to treat it?

1 **A. No.**

2 Q. Have you seen a doctor about whether
3 anything could be done to reduce the discomfort in
4 your eye?

5 **A. I went to an eye doctor. I don't remember**
6 **what was over there.**

7 Q. Did that doctor --

8 **A. I'm going to an eye doctor.**

9 Q. When are you next going to the eye doctor?

10 **A. Couple of weeks after I get back.**

11 Q. Do you have an appointment?

12 **A. Yes.**

13 Q. When you had the sensation in your eye a
14 few weeks ago did you go see the doctor then?

15 **A. No.**

16 Q. You've recently found one?

17 **A. Yes.**

18 Q. You made an appointment for a couple of
19 weeks from now?

20 **A. Yes.**

21 Q. You are wearing glasses today, right?

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1 **A. Yes.**

2 Q. Do the glasses enable you to see?

3 **A. Can you ask that again?**

4 MR. STEINER: Objection.

5 BY MR. HILL:

6 Q. Do the glasses enable you to see well
7 enough for your daily living?

8 **A. Not well enough.**

9 Q. Do the glasses enable you to drive?

10 **A. Yes.**

11 MR. STEINER: Objection.

12 THE WITNESS: Not at night.

13 BY MR. HILL:

14 Q. What do you mean not at night?

15 **A. At night it's a little bit harder for me.**

16 Q. For you to see at night?

17 **A. It's easier for me to see daytime than**
18 **after night.**

19 Q. Do you have any restrictions on your
20 ability to drive?

21 **A. I'm sorry?**

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1 Q. Do you have any restrictions on your
2 ability to drive?

3 **A. What does that mean?**

4 Q. Does your driver's license say can't drive
5 at night or something like that?

6 **A. No.**

7 Q. You are allowed to drive at night?

8 **A. Yes.**

9 Q. You just prefer not to?

10 **A. Yes.**

11 Q. Do you have any trouble driving in the
12 daytime?

13 **A. No.**

14 Q. Do you have any difficulty reading?

15 **A. If it's for a long time.**

16 Q. How long can you read without it being
17 difficult?

18 **A. I don't know. I need to take a break.**

19 Q. How long of a period do you need between
20 breaks?

21 **A. I don't know.**

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1 Q. Hours, three minutes, how long?

2 **A. I don't know.**

3 Q. Occasionally you'll notice that your eyes
4 are tired and you'll take a break?

5 **A. They burn me.**

6 Q. Do you ever put drops in your eyes to help
7 with the burning?

8 **A. No.**

9 Q. Has anyone ever suggested you do that?

10 **A. I don't know.**

11 Q. When was the last time you had your
12 eyeglass prescription checked?

13 **A. Last year.**

14 Q. Did it change from the prior year?

15 **A. I don't think so. I don't know.**

16 Q. Do you have any other problems with your
17 eyes other than the injuries you sustained in
18 February 2002?

19 **A. Yes.**

20 Q. What other problems do you have?

21 **A. Keratoconus.**

1 Q. What is that?

2 **A. Problem in the eye.**

3 Q. Do you believe the keratoconus is related
4 to the bombing on February 16, 2002?

5 MR. STEINER: Objection.

6 THE WITNESS: I don't know.

7 BY MR. HILL:

8 Q. Has a doctor ever told you it's related to
9 the bombing from February 2002?

10 **A. The doctor said it could be but he can't
11 know.**

12 Q. Tell me what you mean by that.

13 MR. STEINER: Objection.

14 THE WITNESS: Or that it's from a
15 trauma or that it's from birth.

16 BY MR. HILL:

17 Q. Some people develop keratoconus even if
18 they are not injured, right?

19 **A. Yes. It's something that goes around the
20 family.**

21 Q. As far as you know, no one else in your

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1 family has this condition?

2 **A. Not that I know of.**

3 Q. Is the burning in your eye related to the
4 keratoconus?

5 **A. I think in one eye it's more than the
6 other. I don't know. I don't think so.**

7 Q. So you don't know whether the burning
8 might be related to the keratoconus as opposed to
9 the injuries you received in February 2002?

10 **A. Yes.**

11 Q. You mentioned that your eardrum had
12 popped?

13 **A. At the attack.**

14 Q. Did you have any surgery on your eardrum
15 to repair it?

16 **A. I don't think so.**

17 Q. Was your eardrum torn?

18 **A. I don't know.**

19 Q. In any event, you are not having any
20 trouble hearing out of that left ear now, is that
21 right?

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1 **A. Yes.**

2 Q. You mentioned that you had shrapnel in a
3 number of places in your body. Was any of that
4 removed?

5 **A. Some has been removed.**

6 Q. Do you still have some shrapnel in your
7 body today?

8 **A. I have in my eye and in my face.**

9 Q. Apart from your eye and your face, are you
10 aware of any other shrapnel that remains in your
11 body today?

12 **A. Not that I could remember.**

13 Q. Has anyone ever suggested removing the
14 shrapnel from your eye?

15 **A. No.**

16 Q. Has anyone ever suggested removing the
17 shrapnel from your face?

18 **A. No.**

19 Q. Where in your face is the shrapnel
20 located?

21 **A. Under my eye here and here and I have on**

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1 **my forehead.**

2 Q. You also have shrapnel in your left eye,
3 is that correct?

4 **A. Yes.**

5 Q. Has the shrapnel affected your vision in
6 any way?

7 **A. I don't know.**

8 Q. Has anyone ever told you that the shrapnel
9 has affected your vision?

10 **A. I don't know.**

11 Q. When did you first start wearing glasses?

12 **A. Couple of years ago.**

13 Q. Does anyone else in your family wear
14 glasses or use contact lenses?

15 **A. Yes.**

16 Q. Does anyone in your family not use --

17 **A. Yes.**

18 Q. Who doesn't wear glasses?

19 **A. My brother.**

20 Q. Everyone else has them?

21 **A. Yes.**

1 Q. At the time the explosion occurred in

2 February of 2002 approximately how many people were
3 in the pizzeria?

4 **A. I don't know.**

5 Q. You mentioned that there were three people
6 at your table.

7 What's your best estimate for how many
8 people were at the other tables in the restaurant
9 that night?

10 **A. The other tables? I don't know.**

11 Q. At the time of the explosion do you
12 remember what you and your friends were talking
13 about?

14 **A. No.**

15 Q. Do you know what language you were
16 speaking?

17 **A. We spoke in both, but I don't know,
18 Hebrew, English.**

19 Q. Do you remember on this occasion whether
20 you were speaking Hebrew, English or both?

21 **A. No.**

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1 Q. You don't remember?

2 **A. No.**

3 Q. After the attack did you see Keren
4 Shatsky?

5 **A. No.**

6 Q. Did you see Leor Thaler?

7 **A. No.**

8 Q. Did you see Ronit Trattner?

9 **A. No.**

10 Q. Did you see Hillel Trattner?

11 **A. No.**

12 Q. Did you see Steven Braun?

13 **A. Yes.**

14 Q. When did you see Mr. Braun?

15 **A. When I ran out.**

16 Q. As you were leaving the pizzeria you saw
17 Mr. Braun?

18 **A. Yes.**

19 Q. Did you speak to him?

20 **A. I don't remember.**

21 Q. Did he say anything to you?

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1 **A. I don't remember.**

2 Q. Did you observe anything about Mr. Braun's
3 condition?

4 **A. What does "observe" mean?**

5 Q. Did you notice whether he had been injured
6 in any fashion?

7 **A. No.**

8 Q. How did he appear when you saw him?

9 **A. In what sense?**

10 Q. Was he standing, sitting, running,
11 talking, what was he doing?

12 **A. I don't remember.**

13 Q. You just remember seeing him?

14 **A. Yes.**

15 Q. Do you believe you saw anyone else before
16 you left the scene that night other than Mr. Braun
17 after the explosion had occurred?

18 **A. The bus driver.**

19 Q. The only people you remember seeing after
20 the explosion were Mr. Braun and the bus driver, is
21 that correct?

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1 **A. Yes.**

2 Q. Have you now told me about all the
3 physical injuries you believe you received as a
4 result of the explosion on February 16, 2002?

5 **A. Whatever I remember.**

6 Q. Can you think of any other injuries you
7 received on February 16, 2002 you have not yet told
8 me about?

9 **A. No.**

10 Q. Do you believe that you have a mental
11 illness as a result of the events of February 16,
12 2002?

13 **A. I don't know.**

14 Q. Do you believe that you are mentally ill?

15 **A. I don't know.**

16 Q. It's a belief question. Ma'am, do you
17 think you are mentally ill?

18 MR. STEINER: Objection.

19 THE WITNESS: I don't know. I don't
20 know if I'm mentally ill or not.

21 I don't know. I don't know what

1 mentally ill means. I'm not a doctor. I don't
2 know.

3 BY MR. HILL:

4 Q. Have you ever had anyone tell you you had
5 a mental illness?

6 **A. Yes.**

7 Q. Who has told you that?

8 **A. Somebody said I had PTSD. I don't
9 remember.**

10 Q. Did more than one person tell you you had
11 PTSD?

12 **A. I don't remember.**

13 Q. When did someone tell you you had PTSD?

14 **A. I don't know.**

15 Q. Do you believe you have PTSD?

16 **A. I don't know.**

17 MR. STEINER: Objection.

18 BY MR. HILL:

19 Q. Have you had any treatment for PTSD?

20 **A. I don't know. I don't know what the
21 treatment for that is.**

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1 Q. Have you ever sought any treatment for
2 PTSD?

3 **A. I don't know what the treatment is. I
4 don't know.**

5 Q. Do you believe you will need treatment for
6 PTSD in the future?

7 **A. I don't know.**

8 Q. Is anyone else in your family mentally
9 ill?

10 MR. STEINER: Objection.

11 THE WITNESS: I don't know.

12 BY MR. HILL:

13 Q. Does your aunt Esther have a mental
14 illness?

15 **A. I don't know.**

16 Q. Has anyone ever told you that?

17 MR. STEINER: Objection.

18 THE WITNESS: I was told that she is
19 sick. I don't know what she has. She was sick.

20 BY MR. HILL:

21 Q. What kind of sickness did she have?

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<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: I don't know.</p> <p>3 BY MR. HILL:</p> <p>4 Q. You visited with her the last couple of</p> <p>5 times you came to the U.S., right?</p> <p>6 A. Yes.</p> <p>7 Q. Did you talk about the nature of her</p> <p>8 illness?</p> <p>9 A. No.</p> <p>10 MR. STEINER: Objection.</p> <p>11 BY MR. HILL:</p> <p>12 Q. Did she appear to you to be ill?</p> <p>13 A. No.</p> <p>14 Q. Has anyone else in your family ever had</p> <p>15 any mental health treatment that you are aware of?</p> <p>16 A. I don't know.</p> <p>17 Q. Have any of your siblings ever seen a</p> <p>18 psychologist or psychiatrist that you know of?</p> <p>19 A. Since February 2002?</p> <p>20 Q. At any time.</p> <p>21 A. We had the family session stuff.</p>	<p>1 A. No.</p> <p>2 Q. Do you believe your mother has a mental</p> <p>3 illness?</p> <p>4 A. I don't know.</p> <p>5 Q. Do you know if your mother has had any</p> <p>6 mental health treatment?</p> <p>7 A. If she saw a psychologist?</p> <p>8 Q. Yes.</p> <p>9 A. Yes.</p> <p>10 Q. Who did she see?</p> <p>11 A. I think her.</p> <p>12 Q. Valerie Velkes?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know what the treatment your mother</p> <p>15 had consisted of?</p> <p>16 A. No.</p> <p>17 Q. Do you know how frequently she saw</p> <p>18 Ms. Velkes?</p> <p>19 A. No.</p> <p>20 Q. Do you know if she ever took any</p> <p>21 medication?</p>
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<p>1 Q. The family counseling with Ms. Semel, is</p> <p>2 that what you are referring to?</p> <p>3 A. Yes.</p> <p>4 Q. Apart from that, has anyone in your family</p> <p>5 had any sort of mental health treatment that you are</p> <p>6 aware of?</p> <p>7 A. I don't know. Maybe the stuff that I went</p> <p>8 at the time, maybe. I don't know.</p> <p>9 Q. Do you know if any of your siblings were</p> <p>10 seeing the man that you were seeing in elementary</p> <p>11 school?</p> <p>12 A. I don't know.</p> <p>13 Q. Do you believe that any of your siblings</p> <p>14 have a mental illness?</p> <p>15 A. I don't know.</p> <p>16 Q. Have any of them ever told you that they</p> <p>17 are mentally ill?</p> <p>18 A. No.</p> <p>19 Q. Have any of them ever told you that they</p> <p>20 needed any sort of counseling or treatment related</p> <p>21 to the bombing in which you were injured?</p>	<p>1 A. No.</p> <p>2 Q. Do you know if she ever saw anyone other</p> <p>3 than Mr. Velkes?</p> <p>4 A. No.</p> <p>5 Q. Do you know if your father has ever had</p> <p>6 any mental health treatment?</p> <p>7 A. No.</p> <p>8 Q. Are you aware of any evidence that Keren</p> <p>9 Shatsky experienced any conscious pain or suffering</p> <p>10 after the blast on February 16, 2002?</p> <p>11 MR. STEINER: Objection.</p> <p>12 THE WITNESS: No.</p> <p>13 BY MR. HILL:</p> <p>14 Q. Apart from your belief that you heard her</p> <p>15 screaming --</p> <p>16 A. I didn't hear her screaming.</p> <p>17 MR. STEINER: The testimony was she</p> <p>18 heard Rachel screaming.</p> <p>19 BY MR. HILL:</p> <p>20 Q. This was a predicate for a question. Wait</p> <p>21 for the question.</p>

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1 Apart from your belief that you heard her
2 screaming, are you aware of any evidence that Rachel
3 Thaler may have experienced conscious pain and
4 suffering that night?

5 **A. I don't know.**

6 Q. You are not aware of anything other than
7 your belief that you heard her screaming, right?

8 **A. Right.**

9 Q. Ma'am, do you believe that you will earn
10 less money over your working career than you would
11 have earned had you not been injured in February of
12 2002?

13 MR. STEINER: Objection.

14 THE WITNESS: I don't know.

15 BY MR. HILL:

16 Q. Prior to February of 2002 had you ever
17 expressed a desire to pursue a particular career?

18 **A. Please say your question again.**

19 Q. Prior to February 2002 had you ever told
20 anyone what kind of job you wanted to have when you
21 grew up?

1 Q. We'll start again.

2 As of February of 2002 do you believe you
3 had formed a view about whether you, when you grew
4 up and got married, would prefer to not work and
5 stay home with children?

6 **A. I don't know.**

7 Q. Is it fair to say as of February 2002 you
8 didn't know what you wanted to do when you grew up,
9 right?

10 **A. I don't remember if I knew what I wanted
11 to do and what I didn't want to do.**

12 Q. It's fair to say that you cannot remember
13 whether as of February 2002 you had a particular
14 career aspiration, right?

15 **A. Yes.**

16 Q. Can you think of any way that we might
17 attempt to calculate how much more money you would
18 have earned had you not been injured in February of
19 2002 than the amount of money that you will earn
20 over your working life?

21 MR. STEINER: Objection.

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1 **A. I don't remember.**

2 Q. Do you remember as of February 2002 having
3 plans for a career?

4 **A. I don't remember.**

5 Q. I believe your mother stayed at home with
6 you and your siblings for a significant period of
7 your life, right?

8 **A. Yes.**

9 Q. Had you come to any views about whether
10 you would like to stay home and raise children after
11 you were married as of February 2002?

12 **A. Can you say the question again?**

13 Q. Had you come to any views, any opinion in
14 your own mind, about whether when you grew up you
15 wanted to be a stay at home mother as your mother
16 had been for you?

17 MR. STEINER: Objection.

18 THE WITNESS: She wasn't a stay at
19 home mother. At the beginning of my life? She was
20 working. I'm sorry.

21 BY MR. HILL:

1 THE WITNESS: No.

2 BY MR. HILL:

3 Q. Can you think of any way that we might
4 attempt to calculate -- try. Can you think of any
5 way that we might try to calculate how much more
6 money you would have earned had you not been injured
7 in February 2002 than you will actually earn for the
8 rest of your working life?

9 **A. I don't know.**

10 Q. Do you know if anyone has ever attempted
11 to make such a calculation?

12 **A. No.**

13 Q. Is there anything about the injuries you
14 sustained in February of 2002 that prevent you from
15 working?

16 **A. No.**

17 Q. Do you believe you've ever
18 received -- strike that.

19 Do you think that the injuries you received
20 in February 2002 have ever negatively affected your
21 work?

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<p>1 A. Yes.</p> <p>2 Q. In what way?</p> <p>3 A. I'm impatient.</p> <p>4 Q. Has your impatience at work ever resulted</p> <p>5 in you losing a job?</p> <p>6 A. No.</p> <p>7 Q. Has it ever resulted in you not getting a</p> <p>8 promotion?</p> <p>9 A. I don't know.</p> <p>10 Q. Have you ever asked for a promotion and</p> <p>11 not received one?</p> <p>12 A. No.</p> <p>13 Q. Has your impatience ever prevented you</p> <p>14 from getting a job?</p> <p>15 A. I don't know.</p> <p>16 Q. How many lawsuits have you filed?</p> <p>17 A. I don't know.</p> <p>18 Q. Have you ever authorized a lawsuit to be</p> <p>19 brought on your behalf?</p> <p>20 MR. STEINER: Objection.</p> <p>21 THE WITNESS: Like this?</p>	<p>1 THE WITNESS: I don't know.</p> <p>2 BY MR. HILL:</p> <p>3 Q. Are you aware of any evidence that the</p> <p>4 Palestinian Authority had something to do with the</p> <p>5 bombing in which you were injured?</p> <p>6 A. No.</p> <p>7 Q. Are you aware of any evidence that the</p> <p>8 Syrian Arab Republic had something to do with the</p> <p>9 bombing in which you were injured?</p> <p>10 A. No.</p> <p>11 Q. Are you aware of any evidence that the</p> <p>12 Arab Bank had something to do with the bombing in</p> <p>13 which you were injured?</p> <p>14 A. No.</p> <p>15 Q. Do you know if you brought a lawsuit</p> <p>16 against the Arab Bank?</p> <p>17 A. Say again?</p> <p>18 MR. STEINER: Objection.</p> <p>19 BY MR. HILL:</p> <p>20 Q. Do you know if you are a plaintiff in a</p> <p>21 lawsuit against the Arab Bank?</p>
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<p>1 BY MR. HILL:</p> <p>2 Q. Like this or any other lawsuit.</p> <p>3 A. I don't know.</p> <p>4 Q. Do you know who the defendants are in this</p> <p>5 lawsuit?</p> <p>6 A. What's the defendants? The other side?</p> <p>7 Q. Yes, the other side.</p> <p>8 A. The Palestinian something.</p> <p>9 Q. Do you know which Palestinian something is</p> <p>10 on the other side of this lawsuit?</p> <p>11 A. I'm not sure.</p> <p>12 Q. Are you aware of any evidence that the</p> <p>13 Palestinian something -- are you aware of any</p> <p>14 evidence that the Palestinians who are on the other</p> <p>15 side of this lawsuit had something to do with the</p> <p>16 February 2002 bombing?</p> <p>17 A. Say it again.</p> <p>18 Q. Are you aware of any evidence that the PLO</p> <p>19 had something to do with the bombing in which you</p> <p>20 were injured?</p> <p>21 MR. STEINER: Objection.</p>	<p>1 A. I don't know.</p> <p>2 Q. Have you ever been deposed before?</p> <p>3 A. What we're doing now?</p> <p>4 Q. Yes.</p> <p>5 A. Yes.</p> <p>6 Q. On how many occasions?</p> <p>7 A. Once.</p> <p>8 Q. Where was that?</p> <p>9 A. I don't remember.</p> <p>10 Q. Was it in the United States?</p> <p>11 A. No.</p> <p>12 Q. Was it in Israel?</p> <p>13 A. Yes.</p> <p>14 Q. Apart from that one occasion have you ever</p> <p>15 testified before?</p> <p>16 A. I don't know. What's "testify"?</p> <p>17 Q. Have you ever been to court?</p> <p>18 A. No.</p> <p>19 Q. Have you ever sworn or affirmed to tell</p> <p>20 the truth and answered questions?</p> <p>21 A. Yes.</p>

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<p>1 Q. When was that?</p> <p>2 A. I don't remember.</p> <p>3 Q. Was that the deposition we were just</p> <p>4 talking about?</p> <p>5 A. I think so.</p> <p>6 Q. Just that one occasion that you did that?</p> <p>7 A. That I could remember, yes.</p> <p>8 Q. Would you say Rachel Thaler was your</p> <p>9 closest friend?</p> <p>10 A. No.</p> <p>11 Q. Did you have a closest friend as of</p> <p>12 February 2002?</p> <p>13 A. What does that mean?</p> <p>14 Q. As of February 2002 who was your closest</p> <p>15 friend?</p> <p>16 A. Keren Shatsky.</p> <p>17 Q. How would you describe your relationship</p> <p>18 with Rachel Thaler?</p> <p>19 A. A good friend.</p> <p>20 Q. She was not your closest friend?</p> <p>21 A. She wasn't my best friend.</p>	<p>1 newspaper called the Jewish Press. Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. The date on the top of the page is Friday,</p> <p>4 July 26, 2002. Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. At the bottom there's a handwritten note.</p> <p>7 A. Yes.</p> <p>8 Q. Your mother told me that that was her</p> <p>9 handwriting.</p> <p>10 A. Yes.</p> <p>11 Q. Does that look like her writing?</p> <p>12 A. Yes.</p> <p>13 MR. STEINER: Objection.</p> <p>14 BY MR. HILL:</p> <p>15 Q. In the middle of the -- in the second</p> <p>16 column on this first page there is a reprint of what</p> <p>17 purports to be a letter from someone named Shandi</p> <p>18 Wolf.</p> <p>19 Do you know Shandi Wolf?</p> <p>20 A. Yes.</p> <p>21 Q. Who is Shandi Wolf?</p>
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<p>1 MR. HILL: Let's mark this as exhibit</p> <p>2 20.</p> <p>3 (Whereupon the proffered item was</p> <p>4 marked as exhibit 20.)</p> <p>5 BY MR. HILL:</p> <p>6 Q. Take a moment to review exhibit 20 and let</p> <p>7 me know when you've finished reviewing it.</p> <p>8 You are welcome to read all of it or not,</p> <p>9 but let me just know when you are ready for a</p> <p>10 question.</p> <p>11 (Pause)</p> <p>12 THE WITNESS: Okay, I tried.</p> <p>13 BY MR. HILL:</p> <p>14 Q. The first page --</p> <p>15 A. I didn't see the second page.</p> <p>16 Q. Feel free to look at both if you would</p> <p>17 like.</p> <p>18 (Pause)</p> <p>19 THE WITNESS: Okay.</p> <p>20 BY MR. HILL:</p> <p>21 Q. This appears to be a clipping from a</p>	<p>1 A. She was with me in camp.</p> <p>2 Q. Which camp were you at?</p> <p>3 A. Sternberg.</p> <p>4 Q. This is the camp in the Catskills you</p> <p>5 described earlier?</p> <p>6 A. I didn't describe earlier.</p> <p>7 Q. You didn't describe it earlier?</p> <p>8 A. No.</p> <p>9 Q. When were you at this camp?</p> <p>10 A. In the summer of 2002.</p> <p>11 Q. How long were you at the camp?</p> <p>12 A. I don't know. A few weeks.</p> <p>13 Q. Did you know Ms. Wolf before the camp?</p> <p>14 A. No.</p> <p>15 Q. The letter quotes someone who spoke at the</p> <p>16 camp.</p> <p>17 Are you the person who is quoted as having</p> <p>18 spoken at the camp?</p> <p>19 A. Yes.</p> <p>20 Q. I want to ask you about some of the quotes</p> <p>21 that Ms. Wolf attributes to you. In the fifth</p>

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1 paragraph in the central column you were quoted as
2 saying: We live in a world where this type of
3 tragedy could occur anywhere, any time and I guess
4 this was basherte --

5 **A. I can't find you.**

6 **Q. I'll start over.**

7 **A. I don't know where you are.**

8 **Q. You are quoted as saying: We live in a**
9 **world, where this type of tragedy can occur**
10 **anywhere, any time and I guess this was basherte,**
11 **destined to happen to me.**

12 **Do you see that?**

13 **A. Yes.**

14 **Q. The word I'm probably mispronouncing is**
15 **"basherte."**

16 **A. I didn't say that, no. I don't know what**
17 **it is.**

18 **Q. Do you know what that word is?**

19 **A. No.**

20 **Q. Apart from that word do you believe this**
21 **accurately quotes something you said on that**

1 **Q. What is malachim?**

2 **A. Angels.**

3 **Q. In the next paragraph it quotes you as**
4 **saying: We cannot allow the Arabs to see they can**
5 **frighten or destroy us.**

6 **A. Yes.**

7 **Q. Does that accurately reflect what you said**
8 **in the summer of 2002?**

9 **A. Yes.**

10 **Q. The next paragraph you are quoted as**
11 **saying: You are worried if the shirt is from the**
12 **Old Navy or The Gap. We in Israel have to think**
13 **about whose funeral we have to go to next.**

14 **Does that accurately reflect something you**
15 **said in the summer of 2002?**

16 **A. Yes.**

17 **Q. The last sentence of that paragraph is not**
18 **a quote but it says: She said that if -- what's**
19 **that word?**

20 **A. I can't see. "Chas v' Shalom."**

21 **Q. -- we abandon the land, then the Arabs**

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1 occasion?

2 **A. Maybe not in these words but something**
3 **like that, yes.**

4 **Q. You generally said what you are quoted as**
5 **saying here?**

6 **A. Yes.**

7 **Q. In the next paragraph there is a another**
8 **quotation which appears to be attributed to you.**

9 **It says: Hashem must have considered my**
10 **friends to be malachim, angels, free to depart from**
11 **this world, but I guess I was not on their level. I**
12 **still have to work on myself. I still have to grow**
13 **in this world.**

14 **Do you see that?**

15 **A. Yes.**

16 **Q. Do you believe that accurately reflects**
17 **something you said when you spoke at the camp that**
18 **summer?**

19 **A. Yes.**

20 **Q. For the record, Hashem -- what is Hashem?**

21 **A. God.**

1 would get exactly what they desire.

2 **Do you see that?**

3 **A. Yes.**

4 **Q. Do you believe that accurately reflects**
5 **something you said in the summer of 2002?**

6 **A. Yes.**

7 **Q. What does the Hebrew there mean?**

8 **A. I don't know how to say it in English.**

9 **Q. Does it have something to do with peace?**

10 **A. No.**

11 **Q. You are unable to render that Hebrew into**
12 **English?**

13 **A. Yes.**

14 **Q. In the next paragraph you are quoted as**
15 **saying: I used to think that there were terrorist**
16 **Arabs and there were decent Arabs who were willing**
17 **to work and build homes but now I know that all**
18 **Arabs are like the Arab who killed my best friend.**

19 **Does that accurately reflect something you**
20 **said in the summer of 2002?**

21 **A. I don't know. I guess. I don't know.**

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1 Q. Do you have any reason to think that you
2 are inaccurately quoted there?

3 **A. I don't know.**

4 Q. Does that reflect an opinion that you had
5 as of the summer of 2002?

6 **A. At the time in the summer of 2002? I**
7 **guess. I don't remember.**

8 Q. Do you have any reason to think that that
9 was not your opinion in the summer 2002?

10 **A. No.**

11 Q. Your best recollection is this does
12 accurately reflect an opinion you held in the summer
13 of 2002?

14 **A. I don't know exactly.**

15 Q. In what way do you think this does not
16 reflect your opinion as of summer 2002?

17 MR. STEINER: Objection.

18 THE WITNESS: I don't know if I
19 thought that all Arabs are like the Arab who killed
20 my best friend.

21 BY MR. HILL:

1 **A. No.**

2 Q. Did you ever tell anyone that the words
3 attributed to you were not, in fact, words you had
4 spoken?

5 **A. No.**

6 Q. Did you ever tell anyone the words
7 attributed to you were not, in fact, reflective of
8 what you thought?

9 **A. No.**

10 Q. Look at the second page, if you will, of
11 this exhibit.

12 If you would, could you just read this
13 article to yourself and tell me if you believe any
14 of the quotations that are attributed to you which
15 may well be the same as those in the prior article
16 are inaccurate?

17 (Pause)

18 BY MR. HILL:

19 Q. Read as much as you can and tell me --

20 **A. I can't really read it down here.**

21 (Pause)

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1 Q. You believe you may have said that in the
2 summer 2002 then, right?

3 MR. STEINER: Objection.

4 THE WITNESS: I don't know.

5 BY MR. HILL:

6 Q. Are you aware of any reason that Shani
7 Wolf had to misquote you?

8 **A. I don't know.**

9 Q. Have you ever seen this article before?

10 **A. Yes.**

11 Q. Did you see it when it came out?

12 **A. After it came out.**

13 Q. It appears to be in something called
14 Rebbetzin's Viewpoint. Do you see that?

15 **A. Yes.**

16 Q. Is this a column where the column Write in
17 to the Rebbetzin?

18 **A. I don't know.**

19 Q. Did you ever write to Rebbetzin or the
20 Jewish Press and tell them you had been misquoted or
21 inaccurately misquoted?

1 THE WITNESS: I read what I could
2 read.

3 BY MR. HILL:

4 Q. Part of it is difficult to read but from
5 what you could read, do you see anything in this
6 article that's attributed to you that you believe is
7 inaccurate?

8 **A. From what I could read, no.**

9 MR. HILL: There is some difficulty
10 reading this, as the witness notes. If any of the
11 plaintiffs have a more legible copy I request that
12 it be produced.

13 MR. STEINER: I'll take it under
14 advisement and ask that you make a followup request
15 in writing. Are you aware of --

16 MR. HILL: You produced it so I
17 assume it's a clipping from a newspaper.

18 If you have the original newspaper
19 clipping or any other better copy I'd request it be
20 produced.

21 BY MR. HILL:

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<p>1 Q. Ma'am, apart from these two articles, have</p> <p>2 you ever been quoted in any press or media about</p> <p>3 February 16, 2002?</p> <p>4 A. I don't remember.</p> <p>5 Q. Have you ever been interviewed by any</p> <p>6 member of the press or media?</p> <p>7 A. Yes.</p> <p>8 Q. When was that?</p> <p>9 A. What's "press or media"?</p> <p>10 Q. Anybody who publishes or --</p> <p>11 A. Some radio station.</p> <p>12 Q. When was that?</p> <p>13 A. I don't remember.</p> <p>14 Q. How many years ago?</p> <p>15 A. A lot.</p> <p>16 Q. How old were you?</p> <p>17 A. I don't remember.</p> <p>18 Q. Was this before or after the attack?</p> <p>19 A. After.</p> <p>20 Q. Was it after you had gone to the</p> <p>21 United States in the summer of 2002?</p>	<p>1 interview were ever played on the air?</p> <p>2 A. Yes.</p> <p>3 Q. Did you listen to them at the time?</p> <p>4 A. I don't remember. I think so.</p> <p>5 Q. Tell me what you remember having said on</p> <p>6 the radio.</p> <p>7 A. I remember there was music before and then</p> <p>8 they said Chani Friedman is -- I don't know.</p> <p>9 Q. What was the subject of the interview?</p> <p>10 A. The attack.</p> <p>11 Q. Do you remember approximately how long you</p> <p>12 spoke on the air?</p> <p>13 A. No.</p> <p>14 Q. Why were you interviewed on this radio</p> <p>15 station?</p> <p>16 A. I don't know.</p> <p>17 Q. Who asked you to do the interview?</p> <p>18 A. I guess they did. I don't remember.</p> <p>19 Q. What did you say?</p> <p>20 A. In the interview? I don't know.</p> <p>21 Q. Do you remember anything that you said in</p>
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<p>1 A. I don't remember.</p> <p>2 Q. Where was the radio station located?</p> <p>3 A. In Israel.</p> <p>4 Q. Do you remember which radio station it</p> <p>5 was?</p> <p>6 A. I'm not sure.</p> <p>7 Q. Did you go to the studio for the</p> <p>8 interview?</p> <p>9 A. Yes.</p> <p>10 Q. What city did you go to?</p> <p>11 A. I don't know.</p> <p>12 Q. How long were you interviewed?</p> <p>13 A. I don't know.</p> <p>14 Q. Was this a live interview?</p> <p>15 A. No.</p> <p>16 Q. It was recorded?</p> <p>17 A. Yes.</p> <p>18 Q. Do you remember the name of the person who</p> <p>19 interviewed you?</p> <p>20 A. No.</p> <p>21 Q. Do you know if any portions of your</p>	<p>1 the interview?</p> <p>2 A. I'm assuming I said the story of what</p> <p>3 happened to me. I don't remember.</p> <p>4 Q. Have you ever had a recording of this</p> <p>5 radio interview?</p> <p>6 A. I don't remember.</p> <p>7 Q. Do you know if anyone in your family ever</p> <p>8 had a recording of this radio interview?</p> <p>9 A. No.</p> <p>10 MR. HILL: Mr. Steiner, to the extent</p> <p>11 the radio interview is within the possession,</p> <p>12 custody or control of the other plaintiffs I ask it</p> <p>13 be searched for and produced.</p> <p>14 MR. STEINER: We'll take it under</p> <p>15 advisement and ask you to please follow up in</p> <p>16 writing.</p> <p>17 BY MR. HILL:</p> <p>18 Q. Apart from the newspaper articles that are</p> <p>19 exhibit 20 and the radio interviewed that you've</p> <p>20 described, have you ever been quoted in any other</p> <p>21 news or other media?</p>

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1 **A. Yes.**
 2 Q. When was that?
 3 **A. Maybe 2006, 2007.**
 4 Q. What media were you involved in in 2006,
 5 2007?
 6 **A. Television.**
 7 Q. Which station?
 8 **A. I don't remember.**
 9 Q. What was the program?
 10 **A. The name of the --**
 11 Q. The TV program.
 12 **A. Something in the morning. Something**
 13 **morning. I don't know.**
 14 Q. In what country was this?
 15 **A. Israel.**
 16 Q. Do you remember the name of the person
 17 that you spoke to?
 18 **A. Sivan maybe.**
 19 Q. Is that the first name or the last name?
 20 **A. First.**
 21 Q. Do you know the last name?

1 **bombing out of jail.**
 2 Q. What did you say on that subject?
 3 **A. I didn't talk anything about the subject.**
 4 **I just told my story.**
 5 Q. That was the subject of the TV show. You
 6 didn't express an opinion about whether Arabs should
 7 be let out of jail?
 8 **A. I don't remember.**
 9 Q. To the best of your recollection what did
 10 you say on that television show?
 11 **A. The story of the night of the attack.**
 12 Q. Was anybody else interviewed at the same
 13 time you were?
 14 **A. There were more people there, yes.**
 15 Q. Like a panel where different people got to
 16 speak?
 17 **A. Yes.**
 18 Q. Do you remember who else was on the panel
 19 with you?
 20 **A. No.**
 21 Q. Were any of them from Karnei Shomron?

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1 **A. I think Rahav maybe.**
 2 Q. Were you were speaking to Sivan? Were you
 3 interviewed?
 4 **A. Yes.**
 5 Q. Was this a man or woman?
 6 **A. A woman.**
 7 Q. She asked you questions?
 8 **A. I think so.**
 9 Q. Is this like a morning talk show?
 10 **A. Something like that.**
 11 Q. Like Good Morning America or something
 12 like that?
 13 **A. I don't know.**
 14 Q. Had you ever seen this TV show before?
 15 **A. No.**
 16 Q. Do you know what channel it's broadcast
 17 on?
 18 **A. No.**
 19 Q. What did you talk about in this TV
 20 interview?
 21 **A. Letting Arabs that have to do with suicide**

1 **A. No.**
 2 Q. Were any of them involved in the
 3 February 16 bombing?
 4 **A. No.**
 5 Q. Are you aware of whether anyone is in jail
 6 in connection with the February 16, 2002 bombing in
 7 which you were injured?
 8 **A. No.**
 9 Q. Have you ever seen a copy of your
 10 interview that was broadcast?
 11 **A. No.**
 12 Q. Did you ever -- go ahead.
 13 **A. I don't remember.**
 14 Q. Did you watch it when it was broadcast?
 15 **A. No, it was -- maybe it wasn't live. I**
 16 **think as I finished I walked out. I don't remember**
 17 **if it was live or not.**
 18 Q. Do you know if anyone in your family
 19 recorded this TV interview?
 20 **A. No.**
 21 MR. HILL: Mr. Steiner, to the extent

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<p>1 that any of the plaintiffs have a copy of the</p> <p>2 television interview I'd ask that it be produced as</p> <p>3 it is responsive to our outstanding discovery</p> <p>4 request.</p> <p>5 MR. STEINER: We'll take it under</p> <p>6 advisement and ask you to please follow up in</p> <p>7 writing.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Any other press interviews or media</p> <p>10 appearances you've been involved in other than those</p> <p>11 we've talked about today?</p> <p>12 A. No.</p> <p>13 Q. The articles that we looked at that are</p> <p>14 exhibit 20 indicate that you gave a speech in a camp</p> <p>15 in the summer of 2002.</p> <p>16 Apart from that occasion have you ever</p> <p>17 spoken publicly about the events of February 16,</p> <p>18 2002?</p> <p>19 A. I don't remember.</p> <p>20 Q. Have you ever received anything of value</p> <p>21 as a result of the injuries you received in February</p>	<p>1 A. Yes.</p> <p>2 Q. How much are you receiving now?</p> <p>3 A. Around 800 shekels.</p> <p>4 Q. How frequently do you receive 800 shekels</p> <p>5 from the Israeli government?</p> <p>6 A. Once a month.</p> <p>7 Q. How long have you been receiving that</p> <p>8 amount?</p> <p>9 A. I don't know.</p> <p>10 Q. When do you first remember receiving 800</p> <p>11 shekels a month?</p> <p>12 A. I don't know.</p> <p>13 Q. Has that amount changed over time?</p> <p>14 A. I don't know. Maybe a few shekels. I</p> <p>15 don't know.</p> <p>16 Q. You are currently receiving about 800</p> <p>17 shekels a month, right?</p> <p>18 A. Yes.</p> <p>19 Q. You can't remember how long you've</p> <p>20 received that amount?</p> <p>21 A. Right.</p>
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<p>1 of 2002?</p> <p>2 MR. STEINER: Objection.</p> <p>3 THE WITNESS: What?</p> <p>4 BY MR. HILL:</p> <p>5 Q. Has anyone ever paid you money because you</p> <p>6 were injured in February 2002?</p> <p>7 A. No.</p> <p>8 MR. STEINER: I'd ask that you be</p> <p>9 more specific and refer her to Bituach Leumi.</p> <p>10 BY MR. HILL:</p> <p>11 Q. Have you received any money from the</p> <p>12 Israeli government in connection with the injuries</p> <p>13 you received in February 2002?</p> <p>14 A. Yes.</p> <p>15 Q. When did you first receive money from the</p> <p>16 Israeli government?</p> <p>17 A. I don't know.</p> <p>18 Q. How much money have you received?</p> <p>19 A. I don't know.</p> <p>20 Q. Are you still receiving money from the</p> <p>21 Israeli government today?</p>	<p>1 Q. Do you believe you've received it since</p> <p>2 February 2002?</p> <p>3 A. No.</p> <p>4 Q. When did you first receive that money?</p> <p>5 A. I don't remember.</p> <p>6 Q. Do you know if your mother or your father</p> <p>7 received that amount of money prior to you turning</p> <p>8 18?</p> <p>9 A. I don't remember.</p> <p>10 Q. Do you remember when you turned 18 having</p> <p>11 access to an account that had money in it from the</p> <p>12 Israeli government?</p> <p>13 A. No.</p> <p>14 Q. Did you have to apply for that money?</p> <p>15 A. What do you mean?</p> <p>16 Q. Did you have to go to some Israeli</p> <p>17 government office and say I'd like to be paid money?</p> <p>18 A. It doesn't work like that, but yes.</p> <p>19 Q. Tell me how it works.</p> <p>20 A. There's all kinds of different tests you</p> <p>21 go through.</p>

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1 Q. When did you have this testing done?
 2 **A. I don't remember.**
 3 Q. You do remember being evaluated in some
 4 fashion by the Israeli government?
 5 **A. Yes.**
 6 Q. Did you receive some sort of rating,
 7 disability rating, as a result of that?
 8 **A. Yes.**
 9 Q. What percentage injury where you assigned
 10 by the Israeli government?
 11 **A. 20.**
 12 Q. When did you receive that percentage?
 13 **A. I don't remember.**
 14 Q. Has the percentage changed over time?
 15 **A. Since I got the 20 percent? No.**
 16 Q. Has it always been 20 percent, as far as
 17 you know?
 18 **A. I don't know.**
 19 Q. Have you ever asked for a different
 20 rating?
 21 **A. Not that I can remember.**

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1 Q. Have you ever seen any paperwork
 2 associated with this evaluation of 20 percent?
 3 **A. What does that mean?**
 4 Q. What did you have to do to receive the
 5 20 percent rating?
 6 MR. STEINER: Objection.
 7 THE WITNESS: I had to go through all
 8 kinds of tests.
 9 BY MR. HILL:
 10 Q. What kind of tests did you go through?
 11 **A. I remember a doctor, I remember somebody**
 12 **from the health, I don't know what it was. I don't**
 13 **know. Psychologist, psychiatrist.**
 14 **I don't know, and -- I don't know. I can't**
 15 **remember.**
 16 Q. Do you remember the names of any of these
 17 people that evaluated you?
 18 **A. No.**
 19 Q. Was this before you were married?
 20 **A. Yes.**
 21 Q. Was it before you finished high school?

1 **A. I don't remember.**
 2 Q. Was it before you went to college?
 3 **A. Yes.**
 4 MR. HILL: Mr. Steiner, to the extent
 5 the records of the evaluations and the disability
 6 rating and the payments that the witness has
 7 described are within the plaintiff's possession,
 8 custody and control I would request that they be
 9 produced as they appear to be responsive to our
 10 discovery requests.
 11 MR. STEINER: Take it under
 12 advisement, ask you to please follow up in writing.
 13 BY MR. HILL:
 14 Q. Apart from the approximately 800 shekels a
 15 month from the Israeli government have you received
 16 any other money in connection with your injuries
 17 from February 2002?
 18 **A. I don't think so.**
 19 Q. Have you received anything of value from
 20 anyone as a result of your injuries?
 21 **A. What does that mean, "value"?**

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1 Q. Have you received a car, have you received
 2 free rent, have you received a trip that someone
 3 paid for, anything like that?
 4 **A. Yes.**
 5 Q. What have you received?
 6 **A. A trip.**
 7 Q. When was that?
 8 **A. Summer 2002.**
 9 Q. That was the trip to the camp you
 10 described?
 11 **A. Yes.**
 12 Q. Who paid for that?
 13 **A. It's called One Family.**
 14 Q. Apart from paying for your trip in the
 15 summer of 2002 have you received anything else from
 16 One Family?
 17 **A. Another trip in Israel, I think.**
 18 Q. Approximately when was that?
 19 **A. Maybe 2003. I don't know.**
 20 Q. Where did you go?
 21 **A. Up north in Israel.**

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1 Q. What did do you on that trip?

2 **A. We were there for a Shabbos, for a**
3 **weekend.**

4 Q. Where did you go?

5 **A. Tirot Zvi.**

6 Q. Did you speak publicly on that occasion?

7 **A. No.**

8 Q. Were there group sessions or anything like
9 that on that occasion?

10 **A. Not that I could remember.**

11 Q. What do you remember doing on that
12 weekend?

13 **A. I remember being on a bus, going into our**
14 **room. I don't know. I don't remember much.**

15 Q. Any other occasions where One Family gave
16 you something other than the two trips you
17 mentioned?

18 **A. They gave me packages on Purim, on the**
19 **holidays, chocolates.**

20 Q. Anything else you received from One
21 Family?

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1 **A. Not that I could remember.**

2 Q. Have you received anything else from any
3 other charity or organization like that?

4 **A. Not that I could remember.**

5 Q. Do you know if anyone in your family has
6 received anything from the One Family organization?

7 **A. I don't know.**

8 Q. Do you know if any of your parents or
9 siblings have received trips or gifts or anything
10 like that from One Family?

11 **A. I don't know. Oh, my sister was also with**
12 **me on that trip.**

13 Q. Which trip?

14 **A. To the camp.**

15 Q. Miriam went with you to the camp in the
16 Catskills?

17 **A. Yes.**

18 Q. Anyone else in your family receive
19 anything from One Family other than what you've told
20 me about?

21 **A. Not that I could think of.**

1 MR. HILL: Let's take a ten minute

2 break. I want to look over my notes. I think I'm
3 pretty close to being done.

4 (Whereupon, a recess was taken from

5 5:16 p.m. to 5:26 p.m.)

6 MR. HILL: Mark that as exhibit 21.

7 (Whereupon the proffered item was
8 marked as exhibit 21.)

9 BY MR. HILL:

10 Q. Ms. Edri, let me show you what we've
11 marked as exhibit number 21. Have you ever seen
12 this document before?

13 **A. Yes.**

14 Q. What is this?

15 **A. It says my situation in one of the**
16 **subjects.**

17 Q. Most of this is in Hebrew, right?

18 **A. Yes.**

19 Q. There's some handwriting at the bottom
20 that says "one year after attack"?

21 **A. Yes.**

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1 Q. Is that your mom's handwriting?

2 **A. Yes.**

3 Q. Tell me what the paragraph in the middle
4 of the page says roughly.

5 **A. The middle? Here?**

6 Q. There's a paragraph in the middle.

7 **A. We give on Wednesday once in two weeks. I**
8 **don't know how you say it. I don't know. We found**
9 **that your daughter might improve her -- I don't know**
10 **how to translate. I'm really sorry. I don't know.**
11 **Then it says we ask you to explain the importance of**
12 **this issue and to encourage her to get to classes.**

13 Q. Is this some sort of reprimand from the
14 school for you not going to class?

15 MR. STEINER: Objection.

16 THE WITNESS: Yes.

17 BY MR. HILL:

18 Q. This is something that you received in
19 March of 2003, is that right?

20 **A. I didn't receive it.**

21 Q. Your mother received it?

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1 A. Yes.

2 MR. STEINER: Objection.

3 BY MR. HILL:

4 Q. Were you, in fact, refusing to go to class
5 at this point in time?

6 A. Yes.

7 Q. How long did that continue?

8 A. I don't remember.

9 Q. Did you eventually start going back to
10 class in high school?

11 A. Yes, but not all the time.

12 Q. Ma'am, do you have any documents that
13 relate to the injuries you received in February of
14 2002?

15 A. What kind of documents?

16 Q. Any kind of documents that relate to the
17 injuries you received in February 2002.

18 A. Like what?

19 Q. You tell me.

20 A. I don't know. I don't know what you mean.

21 Q. Do you know what a document is?

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1 A. Yes. Is this called -- does this refer to
2 what you are asking?

3 Q. Do you have any papers that relate to the
4 injuries that you received in February of 2002?

5 A. Yes.

6 Q. Where are those papers located?

7 A. The hospital you mean?

8 Q. Anything.

9 A. I don't know. My mother's house maybe.

10 Q. Do you have a file or a box of papers that
11 relate to the injuries you received in
12 February 2002?

13 A. No.

14 Q. You think there might be some at your
15 mother's house?

16 A. Maybe.

17 Q. Where would they be stored in your
18 mother's house?

19 A. I think she has a looseleaf.

20 Q. Where does she keep that looseleaf?

21 A. I don't know.

1 Q. Does she have an office that it stays in?

2 A. I don't know.

3 Q. Is it in the closet?

4 A. I don't know.

5 Q. Have you at one point seen a looseleaf
6 that your mother maintained?

7 MR. STEINER: Objection.

8 THE WITNESS: Yes.

9 MR. HILL: Mr. Steiner, it's not
10 clear to me whether the contents of the looseleaf
11 the witness has described have been produced.

12 I would ask you check with your clients
13 and if it has not been produced that it be produced.

14 MR. STEINER: You have gone over
15 these questions with the mother and you know what
16 the responses are.

17 BY MR. HILL:

18 Q. Apart from the looseleaf that you
19 described, do you have any papers that relate to the
20 injuries you received in February of 2002?

21 A. I don't think so.

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1 Q. Do you own any computers?

2 A. Do I have a computer?

3 Q. Yes, ma'am.

4 A. Yes.

5 Q. How many?

6 A. One.

7 Q. How long have you had that computer?

8 A. Maybe a year.

9 Q. Did you own a computer before that?

10 A. Yes.

11 Q. Do you still have the computer that you
12 owned before the current one?

13 A. Yes.

14 Q. Where is that?

15 A. In a closet.

16 Q. How long did you own the computer that's
17 now in the closet?

18 A. I don't know.

19 Q. When did you buy it?

20 A. I don't know.

21 Q. Did you have it before you were married?

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<p>1 A. No.</p> <p>2 Q. Some time after you were married you</p> <p>3 bought that computer?</p> <p>4 A. Yes.</p> <p>5 Q. Prior to the computer you bought after you</p> <p>6 were married did you have a computer?</p> <p>7 A. I don't know.</p> <p>8 Q. Prior to the computer that your husband</p> <p>9 bought that you've described, did you have access to</p> <p>10 a computer?</p> <p>11 A. Yes.</p> <p>12 Q. What computer was that?</p> <p>13 A. It was at my home.</p> <p>14 Q. The computer in your mother's home?</p> <p>15 A. Yes.</p> <p>16 Q. Has anyone searched the computer that's in</p> <p>17 the closet at home to determine if it has</p> <p>18 information that's been requested from the</p> <p>19 defendants in the lawsuit?</p> <p>20 A. What?</p> <p>21 Q. Has anyone looked on the computer that you</p>	<p>1 throw it out or destroy it as you are probably</p> <p>2 required by law to retain it.</p> <p>3 MR. STEINER: You shouldn't take any</p> <p>4 legal instructions from him.</p> <p>5 MR. HILL: The witness is on notice</p> <p>6 if the material is lost or destroyed it's --</p> <p>7 MR. STEINER: His interpretation of</p> <p>8 the law has no effect on you.</p> <p>9 BY MR. HILL:</p> <p>10 Q. Do you have an e-mail address?</p> <p>11 A. Yes.</p> <p>12 Q. What is it?</p> <p>13 A. Chanifr@walla.com.</p> <p>14 Q. How long have you had that e-mail</p> <p>15 address?</p> <p>16 A. I don't know.</p> <p>17 Q. Have you ever had any e-mail address</p> <p>18 other than that one?</p> <p>19 A. Yes.</p> <p>20 Q. What other e-mail addresses have you</p> <p>21 had?</p>
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<p>1 have in the closet in your home to see if it has any</p> <p>2 documents or other material that's been asked for in</p> <p>3 this lawsuit?</p> <p>4 A. No.</p> <p>5 Q. Has anyone searched the computer that</p> <p>6 you've had for the last year or so to see if it has</p> <p>7 any material that's been requested in the lawsuit?</p> <p>8 A. No.</p> <p>9 MR. HILL: Mr. Steiner, I would</p> <p>10 request that a reasonable search be made of the two</p> <p>11 computers the witness has described.</p> <p>12 THE WITNESS: The other computer</p> <p>13 doesn't work.</p> <p>14 BY MR. HILL:</p> <p>15 Q. A reasonable search of the computers be</p> <p>16 made to determine if they do, in fact, contain</p> <p>17 responsive material and if so that it be produced?</p> <p>18 MR. STEINER: Take it under</p> <p>19 advisement and ask you to, follow up in writing.</p> <p>20 MR. HILL: I would also ask with</p> <p>21 respect to the computer in the closet that you not</p>	<p>1 A. The same thing at Yahoo.com.</p> <p>2 Q. Chanifr@yahoo.com?</p> <p>3 A. Yes.</p> <p>4 Q. Have you ever had any other e-mail</p> <p>5 address?</p> <p>6 A. No.</p> <p>7 Q. Can you access those e-mail accounts?</p> <p>8 A. I don't know.</p> <p>9 Q. When was the last time you accessed the</p> <p>10 walla account?</p> <p>11 A. When I could.</p> <p>12 Q. That is your current e-mail address?</p> <p>13 A. Yes.</p> <p>14 Q. When was the last time you accessed the</p> <p>15 Yahoo account?</p> <p>16 A. I don't know.</p> <p>17 Q. When did you get the walla account?</p> <p>18 A. I don't remember.</p> <p>19 Q. Did the walla account replace the Yahoo</p> <p>20 account?</p> <p>21 A. Yes.</p>

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<p>1 Q. You just don't know how long you've had</p> <p>2 the walla account?</p> <p>3 A. No.</p> <p>4 Q. Did you get it after you got married?</p> <p>5 A. I don't know.</p> <p>6 Q. Have you searched, has anyone searched</p> <p>7 either of these e-mail accounts to see if they</p> <p>8 have information that's been requested in this</p> <p>9 lawsuit?</p> <p>10 A. No.</p> <p>11 MR. HILL: Mr. Steiner, I would</p> <p>12 request a reasonable search be made of the two</p> <p>13 e-mail accounts that the witness has identified</p> <p>14 today to see if they have any material that's</p> <p>15 responsive to our document requests in this case.</p> <p>16 MR. STEINER: Take it under</p> <p>17 advisement and ask you to follow up in writing.</p> <p>18 BY MR. HILL:</p> <p>19 Q. Ma'am, have you given anyone a power of</p> <p>20 attorney?</p> <p>21 MR. STEINER: Objection.</p>	<p>1 lawsuit for harm to your sex life related to the</p> <p>2 February 16, 2002 bombing?</p> <p>3 A. I don't know.</p> <p>4 MR. STEINER: Give me a minute,</p> <p>5 Mr. Hill.</p> <p>6 MR. HILL: You want to confer with</p> <p>7 her?</p> <p>8 MR. STEINER: Yes.</p> <p>9 (Whereupon, a recess was taken from</p> <p>10 5:35 p.m. to 5:36 p.m.)</p> <p>11 MR. HILL: Mark that as exhibit 22.</p> <p>12 (Whereupon the proffered item was</p> <p>13 marked as exhibit 22.)</p> <p>14 BY MR. HILL:</p> <p>15 Q. Back on the record. Ma'am, have you had a</p> <p>16 chance to confer with Mr. Steiner?</p> <p>17 A. Sorry?</p> <p>18 Q. Have you had a chance to speak with</p> <p>19 Mr. Steiner outside the room?</p> <p>20 A. Yes.</p> <p>21 Q. Are you asking to be paid money in this</p>
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<p>1 THE WITNESS: What's that?</p> <p>2 BY MR. HILL:</p> <p>3 Q. Have you given anyone the right to make</p> <p>4 legal decisions for you?</p> <p>5 MR. STEINER: Objection.</p> <p>6 THE WITNESS: I don't think so. I</p> <p>7 don't know.</p> <p>8 BY MR. HILL:</p> <p>9 Q. Who do you think you may have given that</p> <p>10 right to?</p> <p>11 A. Maybe my mother.</p> <p>12 Q. When do you remember doing that?</p> <p>13 A. I don't know.</p> <p>14 Q. Was this after you turned 18?</p> <p>15 A. I don't know.</p> <p>16 Q. Apart from maybe giving it to your mother,</p> <p>17 any other occasion where you think you might have</p> <p>18 given someone authority to make legal decisions on</p> <p>19 your behalf?</p> <p>20 A. I don't know.</p> <p>21 Q. Are you asking to be paid money in this</p>	<p>1 lawsuit for harm to your sex life as a result of the</p> <p>2 bombing of February 16, 2002?</p> <p>3 MR. STEINER: Objection.</p> <p>4 THE WITNESS: I don't know.</p> <p>5 BY MR. HILL:</p> <p>6 Q. Do you understand that you are the</p> <p>7 plaintiff in the lawsuit?</p> <p>8 A. Yes.</p> <p>9 Q. Do you understand that you get to decide</p> <p>10 what claims you wish to bring in the lawsuit?</p> <p>11 A. I don't know.</p> <p>12 Q. Were you sexually active in February of</p> <p>13 2002?</p> <p>14 A. No.</p> <p>15 Q. Do you believe that the bombing of</p> <p>16 February 2002 has harmed your sex life?</p> <p>17 A. I don't know.</p> <p>18 Q. Can you tell me in any way in which your</p> <p>19 sex life has been negatively impacted by the bombing</p> <p>20 of February 16, 2002?</p> <p>21 A. I don't know.</p>

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<p>1 Q. You are married, right?</p> <p>2 A. Yes.</p> <p>3 Q. You have two children?</p> <p>4 A. Yes.</p> <p>5 Q. Do you plan to have additional children?</p> <p>6 A. I hope.</p> <p>7 Q. Do you believe the fact that you were</p> <p>8 injured in a bombing on February 16, 2002 has</p> <p>9 affected your sex life with your husband?</p> <p>10 A. I don't know.</p> <p>11 Q. Are you able to tell me any way in which</p> <p>12 the quality of your sex life has been affected by</p> <p>13 the bombing of February 16, 2002?</p> <p>14 A. No.</p> <p>15 Q. Are you able to tell me in any way in</p> <p>16 which the frequency of sexual relations with your</p> <p>17 husband has been affected by the events of</p> <p>18 February 16, 2002?</p> <p>19 A. No.</p> <p>20 Q. Sitting here today you cannot tell me any</p> <p>21 way in which your sex life has been impacted by the</p>	<p>1 of a crime?</p> <p>2 A. Yes.</p> <p>3 Q. Let me show you what we marked as exhibit</p> <p>4 22.</p> <p>5 Is this the drawing you made earlier today</p> <p>6 when we were discussing where people were sitting</p> <p>7 around the table?</p> <p>8 A. Yes.</p> <p>9 MR. HILL: Subject to our request for</p> <p>10 additional documents I do not have any further</p> <p>11 questions for Ms. Edri at this time.</p> <p>12 MR. STEINER: We reserve the right to</p> <p>13 review and to sign.</p> <p>14 Can I get a copy of 22?</p> <p>15 MR. HILL: Yes.</p> <p>16 MR. STEINER: Thank you.</p> <p>17 MR. HILL: We're off the record.</p> <p>18 (Deposition adjourned at 5:41 p.m.)</p> <p>19</p> <p>20</p> <p>21</p>
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<p>1 events of February 16, 2002, is that correct?</p> <p>2 A. No.</p> <p>3 Q. Have you ever been arrested?</p> <p>4 A. No.</p> <p>5 Q. Have you ever been convicted of a crime?</p> <p>6 A. No.</p> <p>7 Q. Has anyone in your family ever been</p> <p>8 arrested?</p> <p>9 A. No.</p> <p>10 Q. You are not aware of any arrests of any of</p> <p>11 your family members, is that right?</p> <p>12 A. Right.</p> <p>13 Q. Has anyone in your family ever been</p> <p>14 convicted of a crime?</p> <p>15 A. I do not know.</p> <p>16 Q. You are not aware of any criminal</p> <p>17 convictions of any of your family members, is that</p> <p>18 right?</p> <p>19 A. Yes.</p> <p>20 Q. You are agreeing with me? As far as you</p> <p>21 know, no one in your family has ever been convicted</p>	<p>1 Reporter's Certificate</p> <p>2</p> <p>3 I, the undersigned, Certified Court Reporter,</p> <p>4 do hereby certify that the foregoing transcript of</p> <p>5 testimony was taken by me in stenotype and</p> <p>6 thereafter reduced to print under my direction,</p> <p>7 that said transcript is a full, true and</p> <p>8 substantially accurate record of the proceedings,</p> <p>9 to the best of my ability.</p> <p>10 I do further certify that I am neither counsel</p> <p>11 for, related to, nor employed by any of the parties</p> <p>12 to the action in which this deposition was taken;</p> <p>13 and, further, that I am not a relative or employee</p> <p>14 of any attorney or counsel employed by the parties</p> <p>15 hereto, nor financially or otherwise interested</p> <p>16 in the outcome of the action.</p> <p>17</p> <p>18 /s/ Michael Feuer</p> <p>19</p> <p>20 Certified Realtime Reporter</p> <p>21</p>

CHANI EDRI DEPOSITION

February 11, 2013

Shatsky v. Syrian

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1 Certificate of Deponent
 2 I hereby certify that I have read and
 3 examined the foregoing transcript, and the same
 4 is a true and accurate record of the testimony
 5 given by me.

6 Any additions or corrections that I feel
 7 are necessary I will attach on a separate sheet
 8 of paper to the original transcript.
 9

10 _____
 11 Signature of witness

12 I hereby certify that the individual
 13 representing him/herself to be the above named
 14 individual, appeared before me this _____
 15 day of _____ and executed the above
 16 certificate in my presence.
 17
 18
 19

20 _____
 21 Notary Public

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1
 2 Errata Page of Deponent
 3 Please note any errors on this sheet. The
 4 reasons may be general, such as "to correct
 5 stenographic error" or "to clarify the record."
 6 When completed, send this page to the attorney
 7 who took your deposition, NOT the court reporter.
 8 Page Line Correction Reason For Change
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